

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

Chicago Oversight Division
230 South Dearborn Street, DPN 30-6
Chicago, Illinois 60604

**Classification Appeal Decision
Under Section 5112 of Title 5, United States Code**

Appellants: [Names]

Representative: [Name]

Agency classification: Medical Supply Technician
GS-622-5

Organization: Department of Veterans Affairs
Medical & Regional Office Center
[Name] Service
[Name] Section
[City, State]

OPM decision: **GS-622-5**
Medical Supply Technician

OPM decision number: **C-0622-05-02**

/s/

Douglas K. Schauer
Classification Appeals Officer

January 31, 2001

Date

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

Decision sent to:

[appellant's names and address]

[name and address of appellants' servicing personnel office]

[name and address of appellant's representative]

Mr. Ronald E. Cowles
Deputy Assistant Secretary for
Human Resources Management
Department of Veterans Affairs
Washington, DC 20420

Introduction

The appellants contest their agency's classification of their position as Medical Supply Technician, GS-622-5. The position is located in the Department of Veterans Affairs, Medical & Regional Office Center, [Name], [Name], [City, State]. The appellants believe their position description accurately describes their major duties and responsibilities, but feel their work warrants higher credit for Factor 1, Knowledge.

Position information

The appellants are six of approximately 44 employees within the [Name] Service, which includes a mixture of blue and white collar occupations. They include: Supervisory Inventory Management Specialists, Supply Technicians, Housekeeping Aids, Materials Handlers, and Laundry Machine Operators. The Service has a total of six Medical Supply Technicians (the appellants), and a Lead Medical Supply Technician, GS-6.

The [Name] Section is the central point in the Medical Center from which supplies are moved to areas of need and the central point to which contaminated supplies are sent. The appellants clean, package, assemble, sterilize, and distribute supply items used for patient care in the hospital's wards, operating rooms, laboratories, and clinics. The appellants' duties fall within four distinct areas:

Equipment Operation

The appellants operate an ultrasonic cleaner, washer/sterilizer, dryer, cart washer, steam sterilizers, gas sterilizer, and aerator.

Decontamination

The appellants collect contaminated supplies and portable equipment from wards, operating rooms, laboratories, and clinics of the hospital according to schedule. Based on the item to be cleaned; i.e., suction bottle, or fiber optic cable, the appellants select the proper cleaning agent and method.

Equipment and Tray Assembly and Packaging

The appellants check the condition of operating room trays, instruments and needles for cleanliness and damage and replaces them as required. Trays are assembled, wrapped, dated, initialed, and labeled. The appellants also assemble and stock all equipment for stations and case carts.

Distribution

The appellants restock supply closets and carts located in the wards, operating rooms, laboratories, clinics, and storerooms. The supply closets and carts are inventoried daily and replenished with supplies and equipment. The appellants also distribute supplies and equipment based upon special requests and requisition tickets.

Analysis and findings

Series and title determination

The Medical Supply Aide and Technician, GS-622, series covers positions like the appellants that provide wards, clinics, operating rooms, and other hospital facilities with medical supplies, instruments, sets, and equipment requiring a knowledge of aseptic techniques and sterilization practices; the care, functioning, and uses of supplies, equipment, sets, and instruments; and methods for the preparation, storage, and issue of sterile and non-sterile medical supplies and the maintenance of adequate stock levels.

The prescribed title for nonsupervisory positions at GS-4 and above in the GS-622 series is *Medical Supply Technician*.

Grade determination

The Office of Personnel Management (OPM) *Medical Supply Aide and Technician Series, GS-622*, standard, dated July 1981, is written in Factor Evaluation System (FES) format. Under FES, work must be fully equivalent to the factor-level described in the standard to warrant credit at that level's point value. If work is not fully equivalent to the overall intent of a particular level described in the standard, a lower level and point value must be assigned, unless the deficiency is balanced by an equally important aspect of the work that meets a higher level.

The appellants raise issues specific to one of the nine factors discussed in the standard. Accordingly, this decision details our analysis of that disputed factor. However, as an internal part of our evaluation we have reviewed all factor levels assigned by the agency. Our discussion and conclusions follow.

Factor 1: Knowledge Required by the Position

This factor assesses the nature and extent of information or facts that employees must understand to do acceptable work (e.g., steps, procedures, practices, rules, policies, theories, principles, and concepts) and the nature and extent of the skills needed to apply those knowledges.

The appellants claim:

We disagree with the classification of this Position and refer the reader to an OPM Benchmark Position Description. Please note that this PD was classified using the Factor Rating System. We feel inclined to point out a classification error in that the local facility assigned points for Level 1-3 (350) in "Knowledge Required by the Position." While Level 1-4 (550 points) is used to describe the position. Rather than utilizing the OPM Benchmark, this facility is attempting to downgrade the knowledge required by the position.

The appellants are disputing that the agency assigned Level 1-3 and 350 points for Factor 1, and not disputing the description for that factor. The benchmarks contained in OPM classification standards are intended to serve as an illustration of typical combinations of factor levels at different grade levels. They are not intended to serve as specific criteria to assign a factor level, although they may be used so if they accurately describe the factor. The classification of a position is based on the predominant duties and responsibilities assigned and the purpose for which the position has been established. For Factor 1, the appellants' position description contains the GS-622 classification standard's language from the benchmark description of a Medical Supply Technician, GS-622-5, BMK #1, Level 1-4, 550 points. We will compare the duties to the Factor 1 factor level description to determine whether Level 1-3 or Level 1-4 is more appropriate.

As described at Level 1-3, the appellants are credited for their knowledge of the way infection is spread in order to understand the importance of clean and sterile medical supply operations and practices. They possess and utilize knowledge of technical names, general uses, physical characteristics and the procedures for inspecting, disassembling, and reassembling; decontaminating; packaging; sterilizing; storing; and issuing the full range of medical supplies and equipment used in the wards and clinics of the hospital. They have and use knowledge to operate a variety of equipment and to test the proper operation of the equipment, making any adjustments and reporting malfunctions.

At Level 1-4, Medical Supply Technicians utilize a practical knowledge of microbiology, human anatomy and physiology, and medical and surgical procedures combined with an intensive knowledge of asepsis techniques and the functions and activities of the wards, clinics, and operating room suite sufficient to meet recurring, emergency, or special individual medical supply and equipment needs and to advise medical personnel on the availability and economical use of supplies and equipment, appropriate sizes, possible substitutes, and the proper use and troubleshooting of equipment. It requires knowledge of the technical names, uses, physical characteristics, maintenance procedures, and assembly, adjustment, and processing procedures for the full range of medical and surgical supplies and equipment used in the hospital. This includes the more delicate and costly equipment such as microsurgery instruments, camera lenses, and complex medical equipment which requires expert care, careful attention, and precise adjustments. It requires knowledge and skills to properly assemble the full range of trays and sets used in the hospital, including those used in the operating room suite. It also requires proficiency in the selection, use, testing, and adjustment of the various washers, sterilizers, aerators, and other equipment, and the appropriate cleaning agents and techniques to use for a wide variety of

equipment (stainless steel instruments, titanium instruments, flexible tubing, mammary prostheses, electric drills).

Like Level 1-4, the appellants have a practical knowledge of microbiology, human anatomy and physiology, and medical and surgical procedures. Such knowledge is used in recognition of the differences between a tracheotomy and hip replacement tray, understanding that a bone marrow tray is the same as a Sterno puncture tray, and enabling the appellants to suggest substitutions when requested by medical staff. The supervisor verified that such knowledge was required, but not because the decontamination or tray preparation process was more complex. Instead, the knowledge is required because the instruments and supplies themselves may be complex and delicate. Each process (sterilizing, distributing, and packaging) and supply item (equipment, instruments, trays, and sets) encountered by the appellants encompasses the full range from simple to complex. This range may require special handling of the more delicate instruments and determining the appropriate sterilizing method. Examples include: sterilization - flash washer to gas; contacts - ward clerks to doctors; equipment - suction bottles to fiber optic cords and scopes; trays - central IV to tracheotomy or major orthopedic; and cleaning agents - mild disinfectants such as alcohol to hazardous chemicals such as Ethylene Oxide Gas (E+O), Cidex, or Gluderaldehyde.

We verified in our discussions with several of the appellants independently that, to the extent possible, all six appellants are involved in the same duties. This was confirmed with their supervisor. Each appellant is assigned one specific area (equipment operation, decontamination, equipment and tray assembly and packaging, or distribution) on a weekly basis. This does not preclude them from having to work in another area(s) not specifically assigned that week if dictated by demands placed on the unit (i.e., absence of other Medical Supply Technicians, or emergencies).

The appellants' selection of the appropriate method for the various stages of their work involves a combination of knowledge, past experience, and standard operating procedures. The supervisor stated that trays are prepared by picking the appropriate items from a list. For a specific tray, i.e., general vascular, there are specific numbers assigned to each item that make up the tray. Some trays contain 60-70 items. The existence of a numerical system does not relieve the appellants of knowledge and understanding and identification of instruments, and their handling and treatment of them. Other medical staff (ranging from ward clerks to doctors) in the facility frequently call to ask for information about instruments or equipment relative to a specific procedure. The appellants use their knowledge of the procedure to respond to the inquiry, whether they want to know all of the instruments needed for a procedure or about a substitution. They also cited talking to medical staff through the troubleshooting of equipment, which again requires knowledge of the equipment, the use, and the operation. These recurring and required knowledge characteristics are typical of Level 1-4.

The knowledge required by the appellants' position exceeds Factor Level 1-3, and fully meets that described at Factor Level 1-4.

We evaluate this factor at level 1-4 and credit 550 points.

Factor 8: Physical Demands

This factor covers the requirements and physical demands placed upon the employee by the work assignment. This includes physical characteristics and abilities and physical exertion involved in the work.

The appellants do not disagree with their agency's assignment of Level 8-3. However, we reviewed this factor and disagree with the agency's crediting of Level 8-3. The agency credited Level 8-3 because the appellants are exposed to Ethylene Oxide Gas (E+O) which is a chemical used in a sterilization process. This is not a physical demand as much as it is a factor in their work environment, and it will be addressed in Factor 9.

Level 8-2 is appropriate for positions which perform work requiring regular and recurring physical exertion, lifting supply items weighing up to 50 pounds, and pushing medical supply carts weighing up to 200 pounds. Also at this level are duties that require dexterity in such tasks as inserting small rods into needle openings or precisely aligning component parts while reassembling medical equipment.

Level 8-3 requires more strenuous physical exertion such as lifting medical supply items weighing more than 50 pounds or pushing heavy medical supply carts weighing as much as 600 pounds and working them over rises, such as door sills or positioning them on automatic conveyor tracks.

The appellants lift medical supply items weighing 25 pounds and occasionally some that weigh as much as 50 pounds. They push loaded medical supply carts weighing over 100 pounds, and work them over slight rises such as door sills. The appellants' position does not meet Level 8-3 where work regularly requires lifting of items in excess of 50 pounds and pushing heavy carts weighing as much as 600 pounds.

We evaluate this factor at Level 8-2 and credit 20 points.

Factor 9: Work Environment

This factor considers the risks and discomforts in the employee's physical surroundings or the nature of the work assigned and the safety regulations required.

As discussed under Factor 8, the appellants' exposure to the chemical Ethylene Oxide Gas (E+O) used in the sterilization process is best credited under Factor 9, Work Environment. The appellants are credited with Level 9-2 for work that involves moderate risks and discomforts on a regular and recurring basis. The question is whether recurring exposure to Ethylene Oxide Gas impacts the factor level assigned for Factor 9.

Because level 9-3 is not described in the GS-622 Classification Standard, we used the definition contained in the primary standard. In order to be credited at Level 9-3, the work environment must involve high risks with exposure to potentially dangerous situations or unusual environmental stress that require a *range* of safety and other precautions (emphasis added). Examples include working at great heights under extreme outdoor weather conditions, subject to possible physical attack or mob conditions, or similar situations where conditions cannot be controlled.

Although the appellants wear badges to monitor not only exposure to E+O, but other chemicals and detergents, such risks are credited under Level 9-2 and do not meet the higher level and range of risks or uncontrolled risks as described at Level 9-3. The appellants take the necessary precautions and follow guidelines in order to minimize risks of prolonged exposure to not only E+O, but other chemicals and detergents used in the decontamination and sterilization processes. We evaluate this factor at Level 9-2 and credit 20 points.

FACTOR LEVEL POINT SUMMARY

Factor	Level	Points
1	1-4	550
2	2-2	125
3	3-2	125
4	4-2	75
5	5-2	75
6	6-2	25
7	7-1	20
8	8-2	20
9	9-2	20
	Total:	1035

The table above summarizes our evaluation of the appellants’ work. The total of 1035 points falls within the GS-5 grade range (855-1100 points) as shown on page 8 of the standard.

Decision

The position is properly classified as Medical Supply Technician, GS-622-5.