

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

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

Pay Category Appeal Decision
Under section 5103 of title 5, United States Code

Appellant: [name], et al

Agency classification: Production Shop Planner
(Pipefitter)
WD-4204-6

Organization: Mechanical/Pipe Shop
931/938/956/999
Production Resources Department
[name] Naval Shipyard
Department of the Navy
[location]

OPM decision: Federal Wage System

OPM decision number: C-4204-00-02

Marta Brito Pérez
Associate Director
Human Capital Leadership
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3/14/05

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:

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Introduction

On April 24, 2004, the Philadelphia Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a pay category appeal from Messrs. [names], submitted by their representative as part of a group pay category appeal. The identical additional (IA) jobs (hereinafter referred to as job) are currently graded as Production Shop Planner (Pipefitter), WD-4204-6, in the Production Facilitating Pay Plan (PFPP). They believe that the job should be reclassified as Production Controller, GS-1152-11. The appellants work in the Mechanical/Pipe Shop 931/938/956/999, Production Resources Department, [name] Naval Shipyard (PNS), Department of the Navy, in [location]. We accepted and decided this appeal under title 5, United States Code (U.S.C.), section 5103. We received the complete appeal administrative report on May 24, 2004, and the representative's comments on the report on June 22, 2004.

Background

Messrs. Doyon and Fogarty participated in a group pay category appeal filed previously with the employing agency in a letter dated April 2, 2003. The August 28, 2003, agency appeal decision sustained the activity's decision that the appellants' work was covered by the PFPP within the Federal Wage System (FWS).

General issues

In the appeal rationale, the appellants' representative states that the appellants work as a Production Shop Planners, also known as a Work Packagers, in the PFPP, but that the position should be reclassified as Production Controller, GS-1152-11, because the paramount requirement for the position involves production knowledge as opposed to trades knowledge and because similar positions within the agency have been classified within the General Schedule (GS). By law, we must classify positions solely by comparing their current duties and responsibilities to OPM PCS's and guidelines (5 U.S.C. 5103, 5106, 5107, and 5112). Other methods or factors of evaluation are not authorized for use in determining the classification of a position, such as comparison to positions that may or may not have been properly classified, e.g., the other agency positions identified in the appeal submittal.

The representative's rationale is based, in part, on a concern that the appellants' job is classified inconsistently with other positions. Like OPM, the appellants' agency must classify positions based on comparison to OPM PCS's and guidelines. Section 511.612 of title 5, Code of Federal Regulations, requires that agencies review their own classification decisions for identical, similar, or related positions to insure consistency with OPM certificates. Thus, the agency has the primary responsibility for ensuring that its positions are classified consistently with OPM appeal decisions.

Based on our analysis of the appellants' work, we find that the appellants do not perform the work described in the Production Controller (Ships), GS-1152-10 position description (PD) included in the appeal package. Unlike the appellants' job, these positions are located in an Engineering and Planning Department environment and have functions not assigned to or

performed by the appellants, e.g., “prioritizing work with **input** from Zone Managers, Lead Scheduler, Work Packaging Manager (*emphasis added*).” If the appellants believe that their job is classified inconsistently with others, they may pursue this matter by writing to their agency headquarters human resources office. In so doing, they should specify the precise organizational location, series, title, grade, duties, and responsibilities of the positions in question. The agency should explain to them the differences between their job and the others, or grade those positions in accordance with this appeal decision.

The representative points to cases discussed in the *Digest of Significant Classification Decisions and Opinions (Digest)* in support of his rationale. As discussed in the *Digest* issue prefaces, *Digest* synopses may not reflect all the relevant information bearing on a decision. For this and other reasons discussed in the prefaces, *Digest* items do not supersede or supplement classification standards and do not constitute “case law.” As discussed in the *Introduction to the Position Classification Standards (Introduction)*, *Section III, E.*, a PD, (or job description (JD) in the FWS) is not adequate to make a classification determination: “For a nonsupervisory position, the description should include enough information so that proper classification can be made when the description is supplemented by other information about the organization’s structure, mission, and procedures.” This is amplified in the Classifier’s Handbook, Chapter 3, discussion of PD adequacy which states: “supplemented by otherwise accurate, available, and current information on the organization, functions, programs, and procedures concerned.”

The representative states that the appellants’ PD is “an important starting point for determining whether the paramount knowledge required of the job is trade knowledge or production knowledge.” A PD is the official record of the major duties and responsibilities assigned to a position by an official with the authority to assign work. A position is the duties and responsibilities that make up the work performed by an employee. Classification appeal regulations permit OPM to investigate or audit a position and decide an appeal on the basis of the actual duties and responsibilities currently assigned by management and performed by the employee. An OPM appeal decision grades a real operating position, and not simply the PD. Therefore, this decision is based on the work currently assigned to and performed by the appellants and sets aside any previous agency decision.

We conducted an on-site audit with [name] and interviewed Production Resources Department Managers knowledgeable of the work packaging process. We also interviewed the PNS Work Packaging Process Manager who oversees the work packaging program. In deciding this appeal, we fully considered the audit findings and all information of record furnished by the appellants and their activity at our request. We find that the PD of record (# [number]) contains the major duties and responsibilities assigned to and performed by the appellants and we incorporate it by reference into this decision.

Job information

PNS’s primary mission is the overhaul, modernization, repair, and refueling of Los Angeles Class nuclear powered submarines. The appellants’ representative points to the change in Navy’s industrial management policy starting in the early 1990’s as changing the work performed by the appellants. He describes the change as a shift from trades-based production to

a focus on project production; a shift from how a trade completes its job to how a shipyard successfully overhauls a submarine. Introducing the Advanced Industrial Management (AIM) Program was a mechanism to define and effect the change. Baseline AIM (BAIM) was the initial effort and introduced 6 of the 10 AIM processes. BAIM sought to establish a structured method for planning ship overhauls that could be used on all ships of a class without treating each project to a completely new planning effort. Another objective was to produce reusable data from ship to ship and across shipyards to reduce planning time and increase data accuracy. He states that the standardization of reusable data from ship to ship and across shipyards reduces the need for trade specific knowledge.

The representative states that one of the six processes introduced by BAIM was called “Work Packaging and Control” which is what the appellants do under the AIM process. The work package brings everything together on time and with sufficient materials so that the mechanic and supervisor can successfully and efficiently perform the task. This ensures the control, consistency and accuracy of the packaging process. He says that under AIM, shop planning has become work packaging and job orders have been replaced by work or task packages. The package prepared by the appellants is a hard copy of the necessary documentation for the entire task from start to finish, labor and materials, as well as documentation of quality and safety, including SUBSAFE record review and certification, as authorized, as well as problem resolution as the package’s work is performed.

The appellants’ representative states that AIM shifted the focus from trades and shops to the overall production process in completing a project. He says that task packagers assign work in the most efficient way regardless of what trades skills are necessary to accomplish the work and the work packager no longer works exclusively within the limits of a particular trade. The standardization of guidelines and instructions makes it possible for a work packager to use his or her overall production knowledge in creating multi-task packages and has diminished the requirement for specific trade knowledge.

Responding to the agency’s comments on the appeal rationale, the representative states that the fact that the position is entitled Production Shop Planner is indicative of the type of knowledge required to do the job. He points to the work packaging process as being a production process that involves planning, estimating, and scheduling to create, nurture and complete the work assignment. He states that knowledge of the major trade or trades involved in a task is helpful, but it is subordinate to the production knowledge that is necessary to integrate all the trades into a single work package which allows for the coordination and completion of the work. The representative points to the appellants’ involvement in quality assurance, support documentation and certification for all trades in support of this argument. He points to the PD’s statement that “other trades work can be performed using previous packages and does not require a trade background. The planning for other trades work will be accomplished by reference to previous practices or precedents for similar situations, or by obtaining advice from other planners in the appropriate trades or from the supervisor.” The representative states that there are several shop planners who perform “little, if any, work within their ‘designated’ trade or shop.”

In response to the agency’s conclusion that the appellants’ job is a mixed job so that the final classification should be determined by the highest level of work performed, he states that the

appellants' "quality assurance, SUBSAFE documentation, review and certification process" is "the highest level of work performed." This is "because of the responsibility that goes with it. It involves reviewing work and calculations made by engineers, engineering technicians and other GS employees. It is the final check that is done in the production process which allows the boat to proceed to sea. Significantly, until the last few years, this work was done by GS-9s and GS-11s from Code 133."

The PD of record states that the appellants are responsible for all shop planning for an assigned project, e.g., all machinery, auxiliary, weapons test, or nuclear work. This includes the actions necessary to package, assemble, accomplish Readiness Reviews, release and accomplish records review certification of the Technical Work Documents (TWD). The TWD is developed based on the task group instruction (TGI), and consists of the TGI, supporting documents and materials needed to support accomplishment of the task. The result is a complete Task Package (hardware/software), i.e., materials and documentation, which is presented to the production foreman (trades supervisor) to accomplish shipboard and/or shop work. Using the Work Packaging and Control Process Guide and other applicable instructions, the appellants work to the project schedule in order to stage all TWDs, supporting documentation and material needed to accomplish the work. The appellants function as a central point of contact to facilitate communication between the Zone Managers, trades supervisors, shops, and shipyard technical codes, to ensure continuous work progress.

The record shows that the shipyard technical codes Engineering and Planning Department (Code 200) and the Nuclear Engineering and Planning Department (Code 2300) determine the work to be packaged, prepare, and enter the TGI/TWD into the database. The appellants pull the TWD from the database and assemble the package. The packaging process performed by the appellants is overseen by the Work Process Planning Manager (Code 322) who works for the Operations Planning Manager (Code 322). Each Zone Manager (work is planned by ship zone) determines what TGIs he or she wants packaged to accomplish specific major tasks within the zone and in what order. The appellants are responsible for reviewing the TGI for content to assure that it can be executed as written. This includes reviewing process instructions, drawings, computerized copies of previous jobs (HITKIT), and computerized copies of deficiencies (DTRs) previously reported, etc. Based on that review, the appellants may contact the planning yard (responsible for engineering plans for the vessel) to obtain and insert the most up to date drawings and/or request that the technical code authorize substitution of more up to date drawings.

The appellants are authorized to determine if work authorizations are needed (e.g., to disconnect/reconnect electric power, etc.), and makes sure that required signatures have been obtained. Based on the TGI requirements, they determine the quality assurance and other support documentation required to complete the job and incorporates them into the package, e.g., SUBSAFE (operations that affect the safety of the vessel, such as repairs that pierce the vessel hull), when authorized, that require reentry control records to assure that the vessel can operate safely. They lead the Readiness Review for the TWD which consists of reviewing the package, line by line, with shop supervisors, the Zone Manager, etc., to establish a consistent understanding of package requirements so that it can be released for work.

Based on knowledge of such events as other TWDs pending, they may suggest assembling multiple related packages. The appellants must be able to identify procedures that may be unnecessary (e.g., work can be performed without a power disconnect which will save the need for disconnect/reconnect tags), and contact the appropriate technical code for approval to modify the package. They are expected to identify potential conflicts with other scheduled work, e.g., TGIs that need to use the same special tooling and equipment. The appellants monitor work in their assigned area as it progresses and performs similar planning processes for new work and changes, identifying new material needs, schedule changes or documentation updates necessary to complete the task. This may lead to creating a new TWD or adding to or deleting from the existing TWD. This may also require initiating Deficiency Logs and/or Deficiency Reports for outside purchases. When the TWD is returned by the shop as completed, the appellants assure that all required signatures, support records, forms, etc., are complete and attached and that recorded data is within specifications. If not, they will help to resolve them which may lead to rework or other corrective action.

Work packaging responsibilities include identifying, tracking, delivery, and assembly of all materials needed for the TWD. The appellants are also responsible for equipment removal and tag out (equipment that must be removed to permit TWD accomplishment and is then reinstalled). We find that the PD of record, which has more detailed information about the appellants' work, contains the major duties and responsibilities performed by the appellants, and we incorporate it by reference into this decision.

Pay category determination

Section 5102 of 5 U.S.C. requires that a pay category determination be made as the first step in the position classification process. Section 5102(c)(7) exempts from the GS, employees in recognized trades or crafts, or other skilled mechanical crafts, or unskilled, semiskilled, or skilled manual-labor occupations, and other employees in positions having trade, craft, or laboring experience and knowledge as the paramount requirement.

The *Introduction* defines paramount requirement as the essential, prerequisite knowledge, skills, and abilities needed to perform the primary duty or responsibility for which the position has been established. Whether a position is in a trade, craft, or manual labor occupation depends primarily on the duties, responsibilities, and qualification requirements, i.e., the most important, or chief, requirement for the performance of a primary duty or responsibility for which the position exists. If a position clearly requires trade, craft, or laboring **experience and knowledge** to perform its primary duty, the position is under the FWS. Paramount does not rely on percentages of work time.

The appellants' representative states that the primary distinction between GS and FWS positions is the difference between "production knowledge" and "trades knowledge." He says that "production knowledge" involves work flow, materials needed, and the amount of time necessary to accomplish the work, coupled with the practical knowledge of a variety of shop operations and the ability to translate the knowledge into plans, estimates, and work sequence applications. He states that "trades knowledge" requires the ability to perform trades and crafts work.

These definitions do not comport with the meaning of or use of those phrases in the Federal position classification and job grading systems. Production planning is performed by both GS and FWS jobs. Production knowledge, as defined by the appellants' representative, is used by all FWS supervisors. Situation #1 FWS supervisors (the lowest level described in the FWS Job Grading Standard for Supervisors) are responsible for: (1) planning the use of workers, equipment, facilities, materials, and tools on a day-to-day or project-by-project basis; (2) adhering to work priorities, project schedules, resources, and detailed work plans established by higher level supervisors; (3) following customary work cycles and sequences in planning work assignments; tracking and reporting progress on work assignments and requesting authority to adjust worker assignments and to use overtime, equipment, and materials to meet schedules; and (4) recommending changes to schedules, priorities, and work sequences as necessary and making minor deviations in procedures or redirecting resources under their control to overcome problems such as equipment failure, material delays, or unplanned absences.

Possession and use of trades knowledge does not control the pay category determination of a position. The GS includes positions that use trades knowledge. For example, the GS-802 Engineering Technician position classification standards states, in pertinent part, that:

...many engineering technician positions involve similar contributions to design and development, and incidental fabrication work under the administrative and technical supervision of an engineer. Such an engineering technician may use trade and knowledge and background and may incidentally use a variety of machine tools in fabricating items in lieu of requesting fabrication by a shop.

The *Introduction* provides guidance on determining the proper pay category for borderline situations. We will apply this guidance to address the representative's appeal rationale.

The nature of the work products or services of the organization

The appellants work in the Production Resources Department. Overall vessel planning is vested in the Engineering and Planning Department (Code 200). Nuclear vessel planning functions are assigned to the Nuclear Engineering and Planning Department (Code 2300). The record shows that positions in those organizations perform the production planning functions presented by the appellants' representative as functions integral to the representative's pay category rationale. For example, Production Controllers (PD # 61119, Production Controller (Ships), GS-1152-11) in the Operations Department work with System Engineers, Planners and Estimators, Chief Test Engineers, Project Managers and other project team members from various shops and codes to build and maintain critical path method (CPM) networks and project schedules. They construct key event schedules, test schedules, test sequences, critical path schedules, job summary/boundary sequences, report listings, Gantt schedules, or Bubble charts for work studies, game plans, and special work evolutions. These positions are tasked with reviewing and assigning start and completion dates to prefabricated jobs and new work, constructing game plans, Gantt schedules, or Bubble charts for special projects that can not be modeled with CPM networks or where a lower level of detail is required to manage the work.

Engineering Technicians (PD #N11T1, Mechanical Engineering Technician, GS-802-11) direct the preparation of technical documents such as drawings, design memoranda, and TGIs. They analyze work requests, determine the scope of assignments, set up work packages, issue schedules, design estimate sheets, etc., to support the package. They prepare technical instructions, check work at work sites or aboard ship, and provide work site direction to resolve technical issues. They conduct scoping sessions, as chair of the scoping team, to provide detailed pre-planning support for the project and prepare a scope summary for all work items. The engineering technicians prepare Job Order/TGI instructions which authorize, specify and define the scope of work, provide technical direction and describe the work operations to be performed in work step sequence in sufficient detail to serve as shop work instructions. They prepare material sheets, listing all material to support a drawing, and the shop-to-shop routing of all materials in sequence of shop operations.

The appellants, in turn, are responsible for working within these overall plans and with technical requirements to assemble the technical documents, administrative documents, tools, material, etc., required to execute the TGIs released by Codes 200 and 2300. They act as conduits between the shops personnel and these codes, and supply, to assure that shop personnel understand the requirements of the TWD and that they have the resources necessary to implement the TWD. Work Packaging Process Guide and other BAIM/AIM guidelines, methods, and procedures apply to the entire technical and shop shipyard workforce. Shop personnel must understand the TWD process in order to perform, check, and certify their work. Therefore, the appellants' understanding and use of these requirements does not control the pay category determination of the appellants' work as implied by their representative's appeal rationale.

The appellants' primary and paramount duties flow from the mission and function of the organization in which they work. Their job is not assigned to any of the technical or planning codes. Although listed as shop employees, the appellants are assigned to and work on teams that support availabilities; i.e., vessels at the shipyard for overhaul, modernization, repair, or refueling. Based on the Code 322 analysis of the technical requirements of an availability, the appellants and their co-appellants are routinely assigned to a core team consisting of people with journey level trades knowledge in specific occupations. This core team is reduced as the availability progresses and TWDs are closed. In the appellants' case, they are assigned to assure coverage of pipefitting requirements for an availability. While the appellants are expected to work on TWDs covering other trades, Code 322 expects that the appellants will primarily deal with TWDs consisting of work in his or her primary and closely related trades. The appellants working on second shift, off yard, and on the reduced team as the availability nears completion work on a greater variety of TWDs. However, the appellants and their co-appellants are expected to provide assistance to others working on TWD issues in their primary occupation and are expected to be available to work on TWDs requiring that trade-specific expertise. The nature of the products and services of the appellants' organization (the core team) is to act as bridge between the technical codes and the trades employees based on journey level trades knowledge and experience in their primary trade (paramount knowledge) and general trades knowledge based on working in a multi-trades environment. The fact that the appellants and their co-appellants may spend substantial amounts of time outside their primary trade does not change this requirement.

Working relationships with other positions in the organization

The appellants work with a mixture of GS and FWS employees. However, the primary purpose of their position is to act as a conduit between the shops personnel and the GS technical codes to assure that shop personnel can implement the TWD. Based on their trade background, the appellants are expected to provide a shipboard work perspective on TWD issues. Using their trade experience, they are expected to identify inefficiencies and conflicts in the TWD trades implementation process, e.g., work sequence issues based on knowledge and experience with the location, placement and relationship of equipment needing repair. These planning functions mesh with and act as an extension of the work planning and control responsibilities of the shop FWS supervisory staff, i.e., implementing the GS work planning and scheduling functions of the Codes 200 and 2300.

Normal lines of career progression

The record shows that the normal line of career progression is from and to other trades jobs. Although one or more appellants in the group have occupied GS positions at the shipyard, they have moved into those GS positions after having performed at the journey level in the trade covered by their appealed job. Although the appellants would qualify for movement in FWS supervisory positions and some GS technical positions, the normal career progression is to a supervisory PFPP jobs at the shipyard.

Equitable pay relationships with other positions in the immediate organization

The jobs occupied by the appellants are in the PFPP, which is covered by a special pay plan in the FWS. The system was created to maintain the pay relationships between certain production facilitating jobs and wage supervisors. FWS supervisory pay, in turn, is based on pay relationships between the level of FWS supervised and the type of supervision exercised. Given these facts, the preponderantly FWS nature of the core team, and their official reporting to supervisory PFPP employees, we find that the appealed jobs are properly and equitably aligned with the FWS.

Management's intent, or purpose, in creating the position

The appellants occupy jobs to which "in shop" Production Shop Planners are assigned. Those employees determine the staffing, materials, and equipment needs to fabricate and repair equipment, components, etc., used for ship overhaul, modernization, repair, and refueling in a production shop environment. The use of IA jobs allows management to move its occupants easily to perform the work tasked to any occupant of the IA position, e.g., from in shop planning to core team vessel support. Vacancy announcements for the appellants' jobs show that journey level trades knowledge and experience are mandatory job qualifications.

Integral to the representative's appeal rationale is that performing planning work for trades in which the appellants do not possess or apply journey level knowledge supports the conclusion that trades knowledge is not paramount.

Established OPM policy recognizes that PFPP positions can consist of work in more than one trade when such work involves a substantial “carry-over” of knowledge, skills and abilities from the employee’s journey level trade background to the other trades for which journey level PFPP work is accomplished. For example, in dealing with planning and estimating work, OPM has determined that the 4204 Pipefitter, 4206 Plumber, and 5309 Boiler Plant Equipment Mechanic occupations are similar enough in basic skills and knowledge required to create a PFPP job involving journey level work in all of them. PFPP coverage considerations do not focus on distinguishing between the proportions of the PFPP work of the position at the journey and the subjourney level. So long as prior journey level knowledge and experience is required and applied on a regular and recurring basis, within the meaning of the FWS, and other PFPP requirements are met, the job is covered by the PFPP if (1) a substantial proportion of the job’s time consists of planning and estimating work in a basic trade or craft, or in a group of related trades, and (2) a considerable portion of the employee’s decisions must require application of knowledge and experience in a specific trade or craft involved and a general knowledge of associated trades.

The record shows that management assigns or tries to assign work packages requiring a journey level knowledge to appellants with that trade background. If that is not possible, those appellants are expected to provide technical advice and assistance to the appellants who work those packages. While some of the appellants frequently work second shift and/or work on off yard assignments, the record shows that all of the appellants are subject to and are expected to be ready to perform work packaging assignments that require the exercise of the journey level skills found in their specific trade.

Decision

By application of controlling pay category determination criteria, the appealed job is covered by the FWS.