

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

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

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

**Appellant:** [appellant]

**Agency classification:** Training Instructor  
GS-1712-9

**Organization:** Training Department  
Undersea Warfare Training Division  
Fleet Aviation Specialized Operational  
Training Group, [location] Fleet,  
Detachment [location]  
Department of the Navy  
[location]

**OPM decision:** Training Instructor  
GS-1712-9

**OPM decision number:** C-1712-09-03

/s/

---

Robert D. Hendler  
Classification and Pay Claims  
Program Manager

Sept. 26, 2005

---

Date

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

Decision sent to:

[appellant's address]

Director  
Customer Service Department  
Department of the Navy  
Human Resources Service Center [location]  
[location]

Head, Labor and Employee Relations  
Department of the Navy  
Office of Civilian Human Resources (DON OCHR)  
614 Sicard Street, SE  
Suite 100  
Washington Navy Yard, D.C. 20374-5072

Department of the Navy  
Office of Civilian Human Resources (DON OCHR)  
614 Sicard Street, SE  
Suite 100  
Washington Navy Yard, D.C. 20374-5072

Chief, Classification Appeals  
Adjudication Section  
Department of Defense  
Civilian Personnel Management Service  
1400 Key Boulevard, Suite B-200  
Arlington, VA 22209-5144

## **Introduction**

On July 13, 2004, the Atlanta Field Services Group of the U.S. Office of Personnel Management (OPM) received a classification appeal from [appellant]. His position is currently classified as Training Instructor, GS-1712-9, located in the Training Department, Undersea Warfare Training Division, Fleet Aviation Specialized Operational Training Group, [location] Fleet, Detachment [organization] Naval Air Station, Department of the Navy, [location]. The appellant requested that his position be classified as Training Instructor, GS-1712-11. On July 20, 2004, the Atlanta office notified the appellant that his appeal was being forwarded to the Philadelphia Field Services Group. We received the complete administrative report from the agency on September 7, 2004. We have accepted and decided his appeal under section 5112 of title 5, United States Code (U.S.C).

## **General issues**

The appellant states that his official position description (PD), number XXXX, is accurate and reflects the duties that he actually performs. However, the PD number of record included in the appeal administrative report and on Standard Form 50, Notification of Personnel Action, is PD number XXXX. The appellant believes that the classification of his PD at the GS-9 grade level is incorrect because the scope and level of responsibility required to carry out the assigned major duties far exceed those required by the OPM Grade Level Guide for Instruction Work at the GS-9 grade level, and are more closely aligned to the GS-11 grade level.

A PD is the official record of the major duties and responsibilities assigned to a position by an official with the authority to assign the work. A position is the culmination of the duties and responsibilities that make up the work performed by an employee. Position classification appeal regulations permit OPM to investigate or audit a position and decide an appeal on the basis of the actual duties and responsibilities assigned by management and performed by the employee. This decision is based on the actual work assigned to and performed by the appellant. By law, a classification appeal decision must be based on comparing the appellant's current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112).

To help decide the appeal, we conducted a telephone audit with the appellant on December 20, 2004, and a telephone interview with his immediate supervisor on December 16, 2004. We interviewed a supervisor in the [organization] Curriculum Development Office on December 23, 2004. In reaching our classification decision, we have reviewed the audit findings and all information of record furnished by the appellant and his agency, including his official PD, which we find contains the major duties and responsibilities assigned to and performed by the appellant and we hereby incorporate it by reference into this decision.

**Position information**

The mission of the Undersea Warfare Training Division is to instruct fleet personnel and DoD civilians in specific types of technical courses that concern undersea warfare. The division ensures that training material is available and up to date.

The primary purpose of the appellant's position is to instruct fleet personnel and DoD civilians in training courses concerning electronic warfare and image analysis. The appellant teaches in a formal classroom environment. The appellant states that courses of instruction are extremely complicated, mathematics intensive advanced analysis courses that require adaptation of course material to fit the varying levels of student experience. He indicates that although the course material is fairly standardized, the courses typically have source material problems in that the reference material is voluminous and scattered. He also states that he developed a new course, assigned curriculum development methods to an existing course, and was involved with the complete revision of a course. The appellant states that he participated substantially in course development and modification and constantly performed course review for accuracy and consistency.

The record shows, however, that the appellant teaches standardized technical courses that are used Navy wide. The three courses taught by the appellant are well-structured and standardized. The curriculum developers at [organization] Headquarters provide source and reference materials for each course to all instructors. Instructors have ample training materials. The appellant may make change recommendations for all problem areas regarding assigned course material. Because of the technical nature of the work, all instructors must have competency within the appropriate subject matter; therefore, they may serve as subject matter experts for course development. For new or non-repetitive assignments, his supervisor defines objectives and specific procedures to follow. He trains and qualifies other electronic warfare and image analysis instructors. He coordinates and establishes instructor and training schedules with fleet users and fellow instructors.

**Series, title, and standard determination**

The agency determined that the position is covered by the Training Instruction Series, GS-1712, and is properly titled Training Instructor. The appellant agrees with these determinations and, based on careful review of the record, we agree.

**Grade determination**

The instructions in the Training Instruction Series, GS-1712, state that non-supervisory positions are evaluated by reference to the Grade Level Guide for Instructional Work. The type of work performed by the appellant determines the official title as well as whether Part I or II of the Guide is used to determine the grade level. Part I covers instructor work which involves preparing daily work (lesson) plans, conducting training in traditional classroom situations, evaluating the progress of students, and advising and assisting them to improve their performance. Part II covers instructional specialist work

which involves ascertaining needs for training and education; determining the objectives and scope of courses, the subject to be covered, and the criteria for evaluation; developing, revising, or adapting courses and instructional materials and guides; and evaluating education/training programs to recommend needed changes and improvements. The work performed by the appellant is characteristic of that described in Part I.

The criteria in the Guide cover two broad classification factors: Nature of assignment and Level of responsibility. The following is our evaluation with regard to the two factors.

*Factor 1, Nature of assignment*

This factor encompasses such aspects as the knowledge, skill, and ability required to perform the work, and the complexity and difficulty of the duties and responsibilities assigned.

At the GS-9 grade level, the courses cover a wide variety of topics in well-established areas of a subject-matter field. They include courses taught by a technical service school in the fundamentals and skills of a technical occupation; courses taught at the secondary through basic undergraduate levels; or all subjects taught at an elementary school level. Instructors require thorough familiarity with the assigned subject-matter area and use of a wide range of teaching methods or tools depending on the students' learning requirements. They are usually well structured and have ample training materials. The courses generally involve instructional problems that require organization, illustration, and interpretation of course material in order to reach and motivate students who may pose typical problems of communication and motivation, e.g., diverse ages, backgrounds, and levels of interest in the course. GS-9 grade level instructors need to give concrete expression to the abstract principles and concepts taught at this level. They make recommendations for changes that involve substantive rather than procedural matters, and obtain and adapt current instructional material.

At the GS-11 grade level, the courses cover advanced technical systems or subject-matter areas comparable to the upper-division undergraduate level. These courses are not in standardized or pre-structured form, and they typically have source material problems (e.g., source materials may be excessively numerous, may be difficult to locate, or may be difficult to adapt). GS-11 grade level instructors are responsible for overall maintenance of their assigned courses and determine the need for and initiate changes or updates in course content. Subject-matter problems result from technological changes or new developments in the field and require frequent updating of knowledge and course content by the instructors. The student problems relate to students with complicated, specialized, or persistent learning difficulties, requiring the instructors to modify courses to meet the needs of students. GS-11 grade level instructors are substantially involved in the development or modification of the courses that are taught and frequently demonstrate techniques to trainee instructors and evaluate the performance of lower level instructors.

The duties of the appellant's position are characteristic of the GS-9 grade level. As at that grade level, his primary responsibility is to provide training and instruction to military personnel and DoD civilians on fundamentals and skills of electronic warfare and image analysis so that students become familiar with the principles and techniques. The appellant uses practical knowledge and personal experience in addition to the standardized course materials. The students do not have special learning problems which would require the instructor to modify the course material. The standardized course materials are used Navy-wide. The appellant provides recommendations for improvement of curricula.

The position does not meet the GS-11 grade level. The courses taught by the appellant are equivalent to those taught by a technical service school and not comparable to the upper-division undergraduate level as described at the GS-11 grade level. At the GS-11 grade level, courses are not structured and often have course material trouble, such as too much material, no material, or hard to adapt material. Also, at the GS-11 grade level, instructors are responsible for overall maintenance of their assigned courses and determine the need for modification. The limitations regarding the technical complexity of the courses taught, lack of student problems typical of the GS-11 grade level, and the standardization for course material discussed previously preclude crediting the position at the GS-11 level.

This factor is evaluated at the GS-9 grade level.

*Factor 2, Level of responsibility*

This factor includes such things as independence (e.g., the degree to which work and decisions are supervised or reviewed); the extent to which guidelines for the work are available or must be developed; and the kinds of contacts required to perform the work.

At the GS-9 grade level, instructors independently plan and carry out their training sessions within the prescribed course framework. They resolve normal classroom problems and make outside contacts for supplemental information and materials. On unusual matters or questions of program objectives and policy, they obtain guidance before taking action. Recommendations for course modification receive review for consistency with overall course material, for technical accuracy, and for educational adequacy. Courses of instructors are audited and evaluated periodically by higher level instructors. GS-9 grade level instructors may participate in task analyses for determining training requirements or in special staff studies of training and testing materials, for which they receive specific guidance on coverage, methodology, approaches, and sources to use.

At the GS-11 grade level, instructors may receive course assignments with the source objectives, topics to be covered and general content in a prescribed form, but they typically participate in original course content development and in its subsequent modification. Within the framework of approved course objectives and topics to be

covered, they use such methods as they believe will be most effective. They determine the need for additional subject-matter information and may meet with representatives of outside organizations in order to obtain it. They develop or adapt new or revised training or testing materials for formal course use. The material may be reviewed by the instructor's supervisor for technical accuracy, consistency with course objectives, educational effectiveness, and program policy.

Similar to work at the GS-9 grade level, the appellant works independently, performing the full range of training and instruction. The appellant performs his duties without detailed or specific guidance from his supervisor. The supervisory training instructor is available to assist the appellant to define objectives for any new or non-repetitive assignments. Typical of the GS-9 grade level, the appellant is expected to handle the work in accordance with established methods, procedures, and regulatory guidelines. As at that grade level, the work is reviewed for compatibility with [organization] goals, guidelines, and effectiveness in achieving intended objectives and in terms of the quality of training provided to Navy personnel.

Unlike the GS-11 grade level, the appellant does not receive course assignments with the course objectives, topics to be covered and general content in a prescribed form. The appellant is limited to recommending changes to the course material, which are reviewed by the supervisor, the command subject-matter-experts, program managers, and lead training specialist. Since the course material is standardized and requires minimal modification, and since the appellant's recommendations on course material is reviewed by the supervisor, the command SME, and others, the appellant's position cannot be credited at the GS-11 grade level.

This factor is evaluated at the GS-9 grade level.

### *Summary*

By comparison with Part I of the Grade Level Guide for Instructional Work, both factors are credited at the GS-9 grade level.

### **Decision**

The appellant's position is properly classified as Training Instructor, GS-1712-9.