

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

**Chicago Field Services Group
230 S. Dearborn Street, DPN-30-6
Chicago, IL 60604-1687**

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

Appellant: [appellant]

Agency classification: Product Specialist
GS-301-11

Organization: [section]/Maritime Supplier Operations
Divisions
Directorate of Suppliers Operations
Defense Supply Center [state]
Defense Logistics Agency
[city and state]

OPM decision: Quality Assurance Specialist
GS-1910-11

OPM decision number: C-1910-11-02

/s/
Marta Brito Pérez
Associate Director
Human Capital Leadership
and Merit System Accountability

January 31, 2005
Date

As provided in section 511.612 of title 5, Code of Federal Regulations (CFR), 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).

Since this decision changes the classification of the appealed position, it is to be made effective no later than the beginning of the fourth pay period after the date of this decision (5 CFR 511.702). The servicing human resources office must submit a compliance report containing the corrected position description and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action.

Decision sent to:

PERSONAL:

DLA Defense Supply Center-Columbus

Attn: [appellant 1] -FMAA

[appellant 2]

[appellant 3]

[appellant 4]

[appellant 5]

[appellant 6]

[appellant 7]

[appellant 8]

[address]

[city and state]

[union representative]

[address]

[city and state]

Director, DLA Human Resources

Customer Support Office – [state]

Defense Logistics Agency

[address]

[city and state]

Director, Human Resources

Defense Logistics Agency, Headquarters

8725 John J. Kingman Road

Fort Belvoir, Virginia 22060-6221

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

Introduction

On November 3, 2003, the Chicago Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from Messrs. [appellants] and Ms. [appellant]. [appellant1] was chosen by the group as lead appellant. The appellants are represented by [union representative] of the International Federation of Professional and Technical Engineers, Local #. We received the original agency administrative report (AAR) on November 23, 2003, but during our fact-finding we discovered that several key management documents were missing and requested them. The complete AAR was received on August 26, 2004. The appellants currently occupy identical additional positions, hereinafter referred to as position, classified as Product Specialist, GS-301-11, and assigned to the [section] Support Branch, or one of the Maritime Surface/Subsurface Supplier Branches within the Directorate of Supplier Operations (DSO), Defense Supply Center [city] (DSCC), Defense Logistics Agency (DLA), U.S. Department of Defense, in [city and state]. The appellants believe that their position should be classified as Quality Assurance Specialist, GS-1910-13. We have accepted and decided the appeal under section 5112 of title 5, United States Code (U.S.C.).

To help decide the appeal, a representative of the Chicago Field Services Group conducted a telephone audit with the lead appellant, on January 22, 2004, and a telephone interview with his second-line supervisor on March 19, 2004. We interviewed the second line supervisor because the appellants work in several different branches within the Directorate of Supplier Operations and he is familiar with the workings of each branch. We also contacted the agency headquarters for an overview of the BSM process and discussed related matters with local agency officials. In reaching our decision, we carefully considered the audit and interview findings and all information of record furnished by the appellants and the agency, including the official position description (PD) which we find contains the major duties and responsibilities assigned to and performed by the appellants and we incorporate it by reference into our decision.

Background

In July 2002, DLA entered into the first phase of the concept demonstration phase of its agencywide reorganization called Business Systems Modernization (BSM). In implementing BSM, DLA established a standardized organizational structure throughout its three Defense Supply Centers (DSC's) and the Defense Distribution Center in [city and state], and created a new PD to reflect the new work process combining GS-1670 Equipment Specialist and 1910 Quality Assurance Specialist knowledge and skills. On February 27, 2002, the appellants were reassigned to the DSO at DSCC [city]. They were assigned to their current PD (number #####) in July 2002.

General issues

The appellants' supervisors certified the accuracy of the PD. The appellants agree that their primary work is equally split (45 percent of time each) between the technical equipment and quality assurance (QA) specialties, but disagree with their agency's assignment of their position to the GS-301 series stating that it does not encompass all that the position requires and that the GS-1910 series is more appropriate. The appellants also say that the title of Product Specialist

and use of the Miscellaneous Administration and Program Series, GS-301, is inaccurate, saying it dilutes the qualification requirements and is unsuitable for the work being performed. The appellants further believe that it is their QA work that is grade controlling because it requires the paramount knowledge to perform, administer, and advise on work concerned with assuring the quality of spare parts and other final products

The appellants also make various other statements about the agency's evaluation of their position. In adjudicating their appeal, our only concern is to make our own independent decision on the proper classification of the position. By law, we must make that decision solely by comparing their current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). This decision is based on the work currently assigned to and performed by the appellants and sets aside any previous agency decision. Therefore, the classification practices used by the appellant's agency in classifying the position are not germane to the classification appeal process.

Position Information

DSCC provides weapons system spare parts to the buying commands of all branches of the United States military. DSO is responsible for providing acquisition and logistics support to these organizations and other government agencies for land, maritime, submarine, aerospace, and missile weapons spare parts worldwide. However, the buying command sets the technical criteria for the spare parts for weapons systems and they all must be integrated into the existing platforms and systems. Any changes in a manufacturing process must be approved by the responsible Program Office within the buying command.

The appellants' PD states that they provide technical and QA support to the procurement process for weapon systems spare parts purchased by DLA/DSCC for the military and other Federal agencies. The product specialists' responsibilities include multiple areas of analysis, testing, and evaluation, including QA and general technical information related to the items and services managed by DLA. When necessary, they support the parts control, on-demand manufacturing, standardization, and other programs. Their duties concern three areas: analyzing equipment characteristics, analyzing product quality, and maintaining data used in the management of a weapons system or equipment program. However, the data management responsibilities have been determined to be incidental to the primary QA and technical functions of the position.

Among their equipment analysis duties, which represent 45 percent of their time, the appellants provide technical support to the order fulfillment, planning, and finance programs, including interchangeability and substitutability requirements as well as item and inventory reduction studies. They provide pre- and post-award advice for DLA worldwide concerning a variety of electronic, maintenance, and repair parts, assemblies, components, and subsystems relating to major weapons systems or commodity classes. The appellants review proposed purchases to assure configuration requirements are met. They resolve problems encountered through the independent analysis of technical characteristics, properties, and end uses of items, components, and assemblies. The appellants research technical data to validate specifications and develop proposals to change specifications or technical drawings. They analyze contractor protests challenging technical requirements and coordinate decisions through the legal office. The

appellants interpret technical requirements and recommend approval of contractor manufacturing processes or material substitutions. They also recommend approval of manufacturer requests for deviation from or waiver of contract requirements. The appellants determine contractor conformance to technical requirements and initiate product testing. They review items in critical supply to determine suitable substitute items and perform studies of systemic problems that may involve complete stock classes.

The appellants' product quality work represents 45 percent of the time and involves providing pre- and post-award support to purchasing specialists, engineering support activities (ESA's), military services, and other DLA customers (For editorial convenience, the term "product" is used in the GS-1910 position classification standard (PCS) to denote any of the items, equipment, or systems developed, produced, and acquired by Federal agencies to carry out their missions and functions). They establish inspection requirements based on judgment as to the degree of manufacturing difficulty, manufacturer's reliability, degree of urgency, and item criticality. The appellants evaluate contractor performance and set inspection requirements. They issue Quality Assurance Letters of Instruction to appropriate personnel with the Defense Contract Management Agency (DCMA) to assure contractual QA requirements and provisions are met. The appellants analyze the effect of contract waivers and deviations from specifications on product serviceability, appearance, and safety; estimate the resulting savings or loss to the government; and advise purchasing specialists on their analyses and recommendations. They review technical, contracting, and quality data and develop quality provisions specific to each item, including compliance inspections and tests, laboratory verification testing requirements, first article inspection, bid sample requirements, shelf life requirements, calibration, product demonstration models, and place of inspection and acceptance. The appellants investigate, resolve, and take corrective action to prevent recurrence of product quality deficiencies. They respond to depot complaints and report product quality deficiencies. They establish quality history files by item type, contractor, and specification. The appellants determine quality trends, causes of recurring deficiencies, and recommend corrective action or changes to control procedures. They determine material testing specifications and establish the requirements of the test parameters to include destruction or disposal of item, and determine item entry into the supply system. They coordinate production test contracts with the developing service, DCMA, or other DLA elements.

The appellants' incidental activities, representing 10 percent of their time, include providing additional technical data support as required. Based on their analysis and testing work, the appellants must maintain accurate, up-to-date, item-specific data requirements and master data in the BSM automated systems. They serve as DLA's POC for technical instruction on the agency process needed for compliance and represent DSCC at meetings with industry representatives about standards and specifications. They also work with DSCC's customer account specialists to resolve customer issues when they arise. These incidental activities were found to support equally both the technical and QA functions that have been identified as the major duties and responsibilities of the position.

Series, title, and standard determination.

The appellants believe the position should be classified to the Quality Assurance, GS-1910, occupational series because of the product quality aspects of their work, the agency's requirement that they be quality certified under the Defense Acquisition Workforce Improvement Act (DAWIA), and the agency's use of interns from the Quality Assurance Specialist upward mobility program (career ladder GS-1910-5/7/9/11) as a recruitment source for the position

The agency states that Equipment Specialists, GS-1670, are another major recruitment source for the position. The agency also states that it placed the appellants' position in the Miscellaneous Administration and Program Series, GS-301, and titled it Product Specialist, because the work requires analytical ability, judgment, discretion, and knowledge of a substantial body of administrative/program principles, concepts, policies, and objectives. Since BSM involved the re-engineering of DLA's business processes in the technical/quality functional area, the agency decided to combine GS-1670 Equipment Specialist and GS-1910 Quality Assurance Specialist work into one position where work in each series occupies an equal percent (45 percent each) of the time.

A key consideration in determining the series of a position is the "paramount requirement" of the position. In the GS position classification process, "paramount requirement" is defined as the essential prerequisite knowledge, skills, and abilities needed to perform the primary duty or responsibility for which the position was established. Based on consultation with subject matter experts and classification specialists, the agency determined that while both of the major duties of the appellant's position involve equipment characteristics, they overlap in the areas of analysis, testing, and evaluation and that no definitive knowledge requirement was paramount.

The GS-301 PCS states that the series "covers two-grade interval work which is not elsewhere classifiable and for specialized work for which no appropriate occupational series has been established." The PCS also states, however, that "if the basic subject matter knowledge, the skills, and the career ladder for the positions engaged in such functions are within a specific series, the positions should be classified in that series rather than the GS-0301 series." It is the series of last resort for administrative work and may only be considered after following the series determination process described in the *Introduction to the Position Classification Standards (Introduction)* and the more detailed analytical steps described in the *Classifier's Handbook (Handbook)*.

Chapter 4 of the *Handbook* provides further guidance for determining the proper pay system and series of the primary work of a position. In discussing positions of "mixed series," it states that "When the work of the position is covered by two or more series in one occupational group and no one series predominates, use the general series for that group, typically the -01 series, for the position." However, the *Handbook* provides different guidance when the work of the position falls into more than one occupational group. "If it is unclear whether a particular series predominates", OPM requires "agencies to apply the following guidelines in the order listed to determine the correct series, including the paramount knowledge required, reason for existence, organizational function, line of promotion, and recruitment source"; that is, to apply these criteria as a test to identify the paramount knowledge required in order to determine the proper series in which to classify the position. The paramount knowledge requirement is defined as the most important type of subject matter knowledge and experience required to do the work.

The Equipment Services Series, GS-1670, covers work that involves providing advisory services to those who design, test, produce, procure, supply, operate, repair, or dispose of equipment. Work may also involve developing or revising equipment maintenance programs. The work requires applying an intensive and practical knowledge of the characteristics, properties, and uses of equipment. Knowledge is of the type gained from technical training, education, and experience in functions such as repairing, overhauling, maintaining, constructing, or inspecting equipment.

The Quality Assurance Series, GS-1910, covers positions that are primarily concerned with the systematic prevention of defects and nonconformances, the identification of unsatisfactory trends and conditions, and the correction of factors which may contribute to defective items. The duties of these positions require analytical ability combined with knowledge and application of assurance principles and techniques, and knowledge of pertinent product characteristics and the associated manufacturing processes and techniques.

The purpose of the appellants' position is to provide technical and QA support to the procurement process for weapon systems spare parts purchased by DLA/DSCC for the military and other Federal agencies. The appellants provide technical and quality expertise, maintain item-specific data requirements and master data, and help to answer questions and resolve issues by providing technical advice and guidance.

The appellants' work overlaps three occupational series: Equipment Specialist, GS-1670, Quality Assurance, GS-1910, and Miscellaneous Administration, GS-301. The Equipment Services Series, GS-1670, covers work that involves providing advisory services to those who design, test, produce, procure, supply, operate, repair, or dispose of equipment. The Quality Assurance Series, GS-1910, covers positions that are primarily concerned with the systematic prevention of defects and nonconformances, the identification of unsatisfactory trends and conditions, and the correction of factors which may contribute to defective items. The Miscellaneous Administration and Program Series, GS-301, covers work of a general administrative nature for which no other series is appropriate, such as that concerned with the types, uses, and costs of engineering and logistics data used in the management of a weapons system or equipment program as well as advising management on the identification, selection, acquisition, and control of such data.

Each of these three series belongs to a distinct occupational group. The *Handbook* discusses how to determine the paramount knowledge in the section on "Mixed Series" in Chapter 4, Determining the pay system and series. A "mixed series" position involves work covered by more than one occupational series. For most positions, the grade-controlling work determines the series. When the work of the position falls into more than one occupational group, the proper series may be more difficult to determine. Where mixed occupational group work is involved, as in the appellants' case, the position is classified to the dominant occupational series. The dominant occupational series is determined by examining the paramount knowledge required, reason for existence, organizational function, line of promotion, and recruitment source for the position. We must consider these factors together, since no single one necessarily will result in the most logical decision.

Paramount knowledge required

Most positions have a paramount knowledge requirement even though there may be several different kinds of work assigned to the position. The paramount knowledge is the most important type of subject matter knowledge or experience required to do the work. How this knowledge is acquired has a major affect on how the position should be classified.

The appellants provide technical equipment support to the order fulfillment, planning, and finance programs, as well as item and inventory reduction studies. This type of work requires knowledge of equipment of the kind gained from technical training, education, and experience in functions such as repairing, overhauling, maintaining, constructing, or inspecting equipment. In addition, the appellants receive training about technical knowledge through an internal agency certification program.

The appellants' QA work involves providing support to purchasing specialists, the agency engineering support activities (ESA's), the various military services, and other DLA customers. QA involves a planned, systematic approach designed to provide adequate confidence that products will conform to established requirements throughout the product's life cycle. This requires special knowledge directly relating to the QA aspects of the position and the complexity of the work involving a variety of systematic activities designed to prevent defective or nonconforming products and to assure that these products are acceptable and perform as intended by the BSM reorganization. This QA support work reflects an in-depth knowledge of acquisition expertise required by the current position in combination with the shared product knowledge found in the GS-1670 series. Additionally, the agency requires the successful completion of the formal Defense Acquisition Workforce Improvement Act (DAWIA) Level II certification to do the assigned work. This leads us to conclude that QA presents a higher certification standard than the equipment specialist certification.

Reason for existence

The primary purpose of the position or management's intent in establishing the position is a positive indicator to the appropriate series. In creating the position, the agency combined two functions, equipment analysis and quality assurance, both essential to the organization's mission. The dual nature of the appellants' position is reflected in the two essential functions it performs, as noted above. They provide technical and QA support to the procurement process for weapon systems spare parts purchased by DLA for the military and other Federal agencies. Hence, its reason for existence cannot be linked to a single occupation.

Organizational function

The mission or function of an organization can often provide an indication of the appropriate series for a position. The appellants' organizational mission covers both equipment analysis and quality assurance functions. Since this factor is also shared equally by the use of positions in both the GS-1670 and GS-1910 series, there is no clear support here for a specific series.

Line of promotion

The normal line of promotion for the position and/or similar positions in the organization frequently will indicate the occupational specialization toward which the position is oriented. Quality Assurance offers promotion potential unmatched by any of the other occupational skills required for the position. Equipment Specialist positions in the agency reach the GS-12 level and above are substantially more limited in number than Quality Assurance Specialist positions. Prior to the agency combining the two occupations in FY 2002, Quality Assurance Specialist positions in DLA outnumbered Equipment Specialist by more than two to one at the higher grades (GS-12 and above). Currently and with increased employment, the ratio is about 6 to 1 in favor of Quality Assurance Specialists over those in the GS-1670 series. This gives further support to the importance of QA experience and its associated line of promotion within the agency.

Recruitment source

Supervisors and managers can help in this process by identifying the occupational areas that provide the best qualified applicants to do the work. An analysis of the current population by series shows that the agency recruitment efforts has resulted in the placement of employees in the GS-1910 series by a 2 to 1 ratio over those in the GS-1670 series. This also strongly supports QA as the paramount requirement. Both the GS-1670 and GS-1910 occupations provide a ready source of candidates for the position. Because of the quality certification requirement that the agency imposes on the position, candidates with QA backgrounds are better prepared for the work. Candidates solely with general administrative backgrounds are not adequately prepared to do the position's essential work.

Based upon the preceding analysis, we find the dominant occupation of the position to be Quality Assurance, GS-1910. The GS-1910 QA aspects of the position are representative of the primary and paramount knowledge required. In this case, the paramount knowledge required directly relates to the QA aspects of the position and the complexity of the work to provide Quality Assurance (QA) support to the procurement process for weapon systems spare parts purchased by DLA for the military and other Federal agencies.

Because the appellants' position specifically covers QA work and the QA knowledge to perform that work has been determined to be paramount, it is properly placed in the Quality Assurance Series, GS-1910. The approved basic title for all nonsupervisory positions in the GS-1910 PCS is Quality Assurance Specialist. The use of a parenthetical title for incumbents who specialize in a functional area is usually left to the agency's discretion, however, since none of the paramount duties performed by the appellants are reflected by any of the authorized parenthetical specialization designations described in the titling section of the GS-1910 PCS, we find the use of a parenthetical title to be inappropriate. Therefore, the published GS-1910 PCS must be used for grade level determination.

Grade determination

The appellants' duties and responsibilities will be evaluated using the grade level criteria in the 1910 Quality Assurance position classification standard (PCS) which covers nonsupervisory QA positions at the operational level (i.e., those positions providing direct support to acquisition,

production, maintenance, or supply activities). DLA placed the position in the 301 series, but independently evaluated the appellants' PD using both the Quality Assurance and Equipment Specialists standards. Therefore, we are limiting our evaluation of the position to the criteria contained in the GS-1910 PCS based on our series determination that the QA knowledge required to perform the work is paramount. The appellants do not take issue with their agency's crediting of Factor Levels 1-7, 8-1, and 9-1 using the 1910 PCS. However, the appellants disagree with their agency's crediting of Factor Levels 2-4, 3-3, 4-4, 5-3, 6-3, and 7-3. Based on our review of the record, we find that the appellant's position is properly evaluated at Levels 1-7, 8-1, and 9-1. We will focus our analysis on Factors 2, 3, 4, 5, 6, and 7 and touch on Factor 1 because of its relationship to the evaluation of Factor 4.

The 1910 PCS is a threshold standard and is written in the Factor Evaluation System (FES) format. Positions graded under the FES format are compared to nine factors. Levels are assigned for each factor and the points associated with the assigned levels are totaled and converted to a grade level. Under the FES, each factor-level description in a standard describes the minimum characteristics needed to receive credit for the described level. Therefore, if a position fails to fully meet the criteria in a factor-level description in any significant aspect, it must be credited at a lower level. Conversely, the position may exceed those criteria in some aspects and still not be credited at a higher level. Our evaluation with respect to the FES factors follows:

Factor 1, Knowledge required by the position

This factor measures the nature and extent of information or facts which the employee 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 knowledge.

Even though both appellants and agency agree to crediting this factor at Level 1-7, we are including information here linked to our later discussion in this decision of Factor 4.

The appellants' work is similar to illustration #4 for Level 1-7 which closely parallels the knowledge requirements needed by the appellants to perform their work. The illustration describes a specialist in a staff role responsible for the development, coordination, and implementation of quality systems supporting an activity's program for overhaul, refurbishment, procurement, and proofing of undersea weapons systems, underwater range equipment, and testing apparatus. Like the appellants' own, such work demands extensive knowledge of quality assurance, comprehensive technical knowledge of the activity's mission, and a thorough knowledge of the agency's policy guidelines.

Likewise, this work requires a knowledge of external organizations procedures (such as those used by engineering activities, project offices, or contractors) and skill to be able to review and interpret program directives and technical documentation. Knowledge at this level is applied in establishing quality system interface and coordination, developing the necessary changes to existing activity programs, preparing activity procedural guides and instructions, and

coordinating implementation efforts. Therefore, Level 1-7 is credited for this factor (1250 points).

Factor 2, Supervisory controls

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility for carrying out assignments, and how completed work is reviewed.

At Level 2-4, the supervisor provides assignments in terms of overall objectives and any limitations on the scope of the work. The specialist consults with and advises the supervisor on such aspects as priorities, staffing, or funding requirements, and project milestones. The specialist plans and carries out assignments independently. Work assignments are assessed from the standpoint of overall effectiveness of QA efforts through periodic status reporting, briefings, or reviews. Completed work products are controlled for timely completion, but are generally accepted as technically sound.

At Level 2-5, the employee receives only administrative supervision; the employee is responsible for large scale projects related to overall program administration or quality compliance issues in a technical program area, frequently as the agency's technical expert. The results of the work are considered technically correct and normally accepted without significant change.

The appellants have full technical authority delegated to them, but it is not accompanied with the corresponding responsibility for a significant program or function as required at Level 2-5. Although the appellants have significant technical authority, their program responsibilities are limited and the branch supervisor retains ultimate responsibility and authority for administration of the QA and technical equipment support programs. At Level 2-5, the specialist independently designs, organizes, and carries out large scale projects or special studies related to overall program administration, or quality compliance issues in a technical program area. The appellants do not have such responsibility.

Neither the absence of immediate supervision in the day-to-day operations nor the fact that the appellants' technical decisions are normally accepted serves to support a level above 2-4 without a corresponding increase in responsibility, such as that which accompanies program authority. Because the appellants' position fails to fully meet Level 2-5, Level 2-4 is credited for this factor (450 points).

Factor 3, Guidelines

This factor covers the nature and extent of guidelines for performing the work and the judgment needed to apply the guidelines or develop new guidelines. Guidelines either provide reference data or impose certain constraints on the use of knowledge.

At Level 3-3, there are a number of specific guidelines, but the specialist must adapt and extend the guidelines to situations encountered in planning and accomplishing work. The specialist exercises judgment in interpreting agency guides, regulations, or precedent cases and in adapting this guidance to individual situations and problems arising in the work.

In contrast, at Level 3-4 the specialist uses initiative, extensive experience, and a broad knowledge of QA principles and practices to develop new methods (e.g., development of a detailed approach and methodology is left to the specialist) and recommend policy changes. As noted in the illustration under Level 3-4, the specialist at this level develops new or improved techniques for obtaining effective results and overcoming unusual problems where guides and precedents are lacking.

Based on their knowledge, training, and experience, the appellants use seasoned judgment in adapting guidelines to resolve problems. They review and interpret guidance materials to determine critical characteristics and ensure manufacturing processes incorporate these requirements. They write departures from specifications as necessary and recommend changes to procedures to higher level management.

Their use of guidelines is similar to that described under illustration # 3 of Factor Level 3-3, where the specialist uses a number of guidelines such as maintenance instruction manuals, engineering specifications, technical manuals, drawings, contracts, and quality assurance policy instructions to develop quality characteristics lists governing the maintenance and overhaul of aircraft systems and components. At this level, the specialist reviews and interprets these materials to identify those characteristics considered critical to product acceptability, and insures that these characteristics and any additional quality requirements are integrated into shop process documents. The specialist checks for accuracy of reference to specifications and standards and revises quality characteristics based on analysis of quality feedback data from production shops.

Though the appellants recommend policy and program changes, unlike recommendations characteristic of Level 3-4, theirs do not regularly concern new methods or unusual quality assurance problems where guides and precedents are lacking or where it is highly questionable as to which guidelines may be adapted to the manufacturing process by contractors producing replacement parts. These types of program issues and guideline responsibilities are vested in higher graded positions in the agency. Therefore, Level 3-3 is credited for this factor (275 points).

Factor 4, Complexity

This factor covers the nature, number, variety, and intricacy of tasks, steps, processes, or methods in the work performed; the difficulty in identifying what needs to be done; and the difficulty and originality involved in performing the work.

At Level 4-4, the specialist performs varied duties aimed at insuring the acceptability of products. Level 4-4 involves application of a complete range of QA principles, techniques, and methodologies to plan and accomplish projects for products having complex characteristics. Decisions are based on multiple considerations, e.g., interpretation of numerous specifications and technical data, consideration of a wide range of manufacturing processes and techniques, evaluation of feedback data from using activities, and analysis of test results and processing problems. Broad functions concerned with planning and completing the work include developing the overall plans and approaches based on technical requirements; monitoring the

application and effectiveness of controls and methods; and adjusting QA activities as indicated by quality data trends or conditions.

At Level 4-5, the specialist frequently serves in a program/project leader capacity to accomplish particularly complex, sensitive, or long-term special studies concerning major agency QA programs or equivalent thereof, e.g., major studies concerning maintenance quality programs being carried out at diverse locations of the country. Decisions concerning what needs to be done are complicated because of such factors as the wide dispersion of organizations and activities involved; difficulties in determining scope of the problem in these activities; multiple authorities, policies, and regulations governing the activities; relationships to and interdependence of activities such as the maintenance/supply/logistics functions; and the impact of quality costs on programmed resources. The work involves developing innovative solutions along with implementing instructions for effecting changes involving new methodology, policies, or procedures. Assignments having these characteristics are commonly found at organizational levels having management responsibility for major QA programs of agencies.

Consistent with our discussion under Factor 1 of the level of knowledge required in the position, we find the complexity of the appellants' work is similar to that described at illustration #4 for Level 4-4 where the staff specialist's assignments are concerned with the entire range of quality policies, methods, and regulations applicable to the activity's mission for overhaul, refurbishment, procurement, and proofing of undersea weapons systems, underwater range equipment, and testing apparatus.

As noted in the illustration, at this level the specialist's assignments vary from those involving management level policy considerations to significant problems or trends relative to production or inspection and test functions. The specialist's decisions concerning the planning and development of the activity's quality system support involve investigating and analyzing available quality capabilities and resources, and recommending policy changes or adjustment of resources to meet changing workload conditions, such as the assignment of new systems/equipment projects. The specialist leads special projects or studies to resolve problems relative to inadequate or conflicting data, and to evaluate the impact and effectiveness of existing or new quality assurance policies and methods on activity programs. The specialist analyzes and interprets numerous technical directives and documentation from higher organizational echelons, contractors, and other field activities to determine impact and interface with existing quality assurance programs and systems. The specialist plans and develops necessary changes to present systems, prepares necessary procedural documentation, and coordinates implementation.

Unlike Level 4-5, the appellants' work does not involve developing innovative solutions or new criteria and methods for evaluating program accomplishments and trends. Their work does not regularly require them to resolve major areas of uncertainty in quality assurance arising from changes in program, technological developments, unknown phenomena, or conflicting requirements, such as those that arise when managing major agencywide QA programs or leading critical studies. Their assignments do not meet the level of responsibility described by this factor level, but are reserved for positions at higher organization levels. Level 4-5 is not met, and therefore, Level 4-4 is credited for this factor (225 points).

Factor 5, Scope and effect

This factor covers the relationship between the purpose, breadth, and depth of the assignment and considers the impact of the work products or services both within and outside the organization.

At Level 5-3, the work involves performance of a variety of assignments directed toward ensuring acceptability of products, or acceptable levels of quality in the operations involved. Like Level 5-3, the appellants' work directly influences quality requirements imposed on production processes and affects the timeliness and quality of products and services acquired by the government.

The purpose of the appellants' work is to ensure compliance with all contract requirements covering products being manufactured in one or more contractor facilities and is similar to the situation described by illustration # 1 at Level 5-3, where specialists plan and implement procedures to ensure that requirements are met and the results of their work may affect the timely delivery of acceptable products to their customers.

At Level 5-3, the results of the work affect the acceptability of the products involved in terms of conformance to technical requirements, meeting user's needs in a timely fashion, and performing as intended. For some positions the results of the work impact effectiveness of operations in achieving and maintaining desired quality levels consistent with economy and efficiency. In other work situations, decisions on acceptability of products may impact the financial posture of manufacturers.

At Level 5-4, the purpose of the work is to plan, develop, and implement QA projects of considerable breadth and complexity. Unlike work characteristic of Level 5-4, the purpose of the appellants' work does not concern assessing quality assurance effectiveness for a range of subordinate activities, nor is it directed towards analyzing a variety of unusual conditions or problems, such as those that arise when determining the quality implications of highly specialized products, manufacturing processes, and techniques for a range of agency activities.

At Level 5-4, the results of the work affect a range of agency activities being carried out at a number of locations. For example, projects concerned with quality planning throughout a product's life cycle affect agency programs in areas such as maintenance, supply, or storage as well as those activities in the development and production phases. Similarly, the services provided by technical specialists for a product or commodity typically have application to other agency programs and activities.

Unlike Level 5-4, the appellants' work does not directly affect a wide range of agency activities, industrial concerns, or the operation of other agencies. Their work does not have an impact equivalent to the illustrations given under Level 5-4. For example, unlike illustration #1, the appellants do not develop QA program plans that directly affect agency activities beyond the acquisition stage, such as maintenance and supply support functions, where the activities are typically carried out by a number of organizations at various locations. The appellants are not involved in the initial system acquisition process. Unlike illustration #3, where the specialist

supports the design, development, and acquisition of major weapons systems, their decisions concerning quality problems do not directly impact the activities of major contractors and the work of other agencies since they are not engaged in the system acquisition process. The appellants' work equates to Level 5-3 on both scope and effect. Therefore, Level 5-3 is credited for this factor (150 points).

Factor 6, Personal contacts

This factor covers the type and level of contacts made in carrying out the work. This factor includes face-to-face and telephone contacts and other dialogue with persons not in the supervisory chain essential for successful performance of the work and which have a demonstrable impact on the difficulty and responsibility of the work performed. It considers what is required to make the initial contact, the level of difficulty of communicating with those contacted, and the setting in which the contact takes place, e.g., the degree to which the employee and those contacted recognize their relative roles and authorities. The standard instructs that the same contacts will be evaluated for both Factors 6 and 7.

At Level 6-3, regular contacts extend to employees and officials of other Federal agencies and/or private industry. The individuals contacted vary according to the situation and require that the specialist ensure the persons involved understand their respective roles.

At Level 6-4, contacts are with high level program and QA officials in other Federal agencies, top executives of large private industrial firms, or representatives of foreign governments. The nature of the contacts present special problems that require the specialist to ensure that officials contacted have the responsibility and authority to resolve the issues in question. Level 6-4 describes the highest level of personal contacts found in the Federal service. Characteristically, they occur in highly unstructured settings where the officials may be relatively inaccessible; arrangements may have to be made for accompanying staff members; appointments may have to be made well in advance; each party may be very unclear as to the role and authority of the other; and each contact may be conducted under different ground rules.

The appellants' contacts are with employees, purchasing specialists, QA officials, and laboratory personnel within their agency, at DCMA, other QA specialists, military customers, engineering support architects, and private industry officials, including contract representatives.

Their external contacts are similar to illustration #2 at Factor Level 6-3. In addition to regular contacts with program directors, design/quality engineers, and production managers in the weapons system project office, the quality assurance specialist has regular contacts with quality assurance employees and officials of other agencies who are tasked to perform in-plant quality functions and uses skill and tact in onsite visits to develop a working relationship with the particular agency involved and within the contractor's organization.

While the appellants have occasional contacts with high-level program and QA officials in other Federal agencies and with private industry officials, including contacts with presidents, vice-presidents, and other company representatives, our fact-finding disclosed that these contacts are not regular and usually are highly unstructured. For example, unlike illustration #1 under Level

6-4, the appellants' contacts with high level officials are not to discuss, as the principal Government representative for quality matters, customer requirements, quality checks, or onsite evaluations of products. Such a role is reserved to managers and specialists higher in the agency's organization. Therefore, this factor is credited at Level 6-3 (60 points).

Factor 7, Purpose of contacts

This factor covers the reasons for the contacts identified under Factor 6. The purpose of contacts ranges from factual exchanges of information to situations involving significant or controversial issues and differing viewpoints, goals, or objectives. The personal contacts, which serve as the basis for the level selected for this factor, must be the same as the contacts identified under Factor 6.

At Level 7-3, contacts require considerable skill to influence and motivate individuals to correct deficiencies that would otherwise result in unacceptable products. Officials may have a limited understanding of the quality requirements involved, may dispute the nature of the requirements, or have a less than cooperative attitude.

At Level 7-4, the purpose of contacts is to negotiate or settle significant issues or problems which may escalate to higher levels because established channels and procedures have failed to resolve the problem.

Similar to Level 7-3, the purpose of the appellants' contacts outside the agency is to negotiate and settle significant quality issues and problems with management representatives. The appellants' contacts involve the explanation of quality requirements to contractors and others who may not readily accept the requirements. The appellants' must use skill and judgment to persuade individuals to correct deficiencies or change procedures. Like illustration # 2 at Level 7-3, their work involves regular visits to agency test sites, production and maintenance activities and contractor plants to evaluate materials processes and provide technical assistance pertaining to various types of materials and their fabrication. They must be skilled in explaining requirements and in motivating contractors to change processes or operations to produce acceptable products.

Unlike Level 7-4, the purpose of the appellants' contacts with those outside their agency does not include the resolution of issues or problems of such significance that they must lead a special study project or interagency working group to achieve a common understanding of the root causes and to develop acceptable alternatives. This authority is retained by higher echelon officials, including the buying command which sets the technical criteria for the spare parts for weapons systems to insure they are integrated into the existing platforms and systems. Therefore, this factor is credited at 7-3 (120 points).

Summary of FES Factors

In summary, we have credited the position as follows:

<i>Factors</i>	<i>Level</i>	<i>Points</i>
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1. Knowledge required by the position	1-7	1250
2. Supervisory controls	2-4	450
3. Guidelines	3-3	275
4. Complexity	4-4	225
5. Scope and effect	5-3	150
6. Personal contacts	6-3	60
7. Purpose of contacts	7-3	120
8. Physical demands	8-1	5
9. Work environment	9-1	<u>5</u>

Total points: 2540

A total of 2540 points falls within the GS-11 grade level point range (2355 – 2750) according to the grade conversion table in the GS-1910 PCS.

The agency evaluation of the position using the GS-1670 PCS directly paralleled the Factor Levels credited using the GS-1910 PCS. Based on our analysis of the position, application of the GS-1670 would not yield a higher grade than that provided by the directly applicable and controlling GS-1910 PCS.

Decision

The position is properly classified as Quality Assurance Specialist, GS-1910-11.