

U.S. Office of Personnel Management
Pay Category Appeal Decision
Under sections 5103 and 5112 of title 5, United States Code

Appellant: [Name of appellant]

Agency classification: Materials Handler
WG-6907-6

Organization: [Appellant's organization/work location]
Federal Acquisition Service
General Services Administration

OPM decision: Covered by the General Schedule

OPM decision number: C-6907-00-01

//Ana A. Mazzi

Ana A. Mazzi
Deputy Associate Director
Merit System Audit and Compliance

4/10/12

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 (Introduction)*, 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 effective no later than the beginning of the fourth pay period after the date of this decision (5 CFR 511.702). As indicated in this decision, our findings show the appellant's official position description (PD) does not meet the standard of adequacy described in section III.E. of the *Introduction*. Since PDs must meet the standard of adequacy, the agency must revise the appellant's PD to reflect our findings, describing his duties and responsibilities in the Factor Evaluation System (FES) format, and classify the position in the General Schedule by exercising its original classification authority. The servicing human resources office must submit a compliance report containing the corrected PD 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 to the OPM office that accepted the appeal.

Decision sent to:

[Appellant's and representative's names and mailing address]

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Introduction

On September 9, 2011, the U.S. Office of Personnel Management's (OPM) San Francisco Oversight accepted a classification appeal from [name of appellant]. On October 25, 2011, we received the agency's complete administrative report. The appellant's job is currently graded as Materials Handler, WG-6907-6, and in his original request he indicated his duties and responsibilities should be classified in the General Schedule (GS). Subsequently, he clarified his request specifying the job be classified in the GS-2005 series at the GS-7 grade level. The appellant works in the [appellant's organization/work location] Federal Acquisition Service, General Services Administration (GSA). We have accepted and decided this appeal under sections 5103 and 5112 of title 5, United States Code (U.S.C.).

General issues

The appellant believes his current job description (JD) [number] is inaccurate because it describes material handling duties which he does not perform, and does not fully address his shelf-life coordinating responsibilities. However, the appellant's supervisor has certified to the accuracy of the appellant's JD. A JD is the official record of the major duties assigned to a job by an official with the authority to assign work. A job is the work made up of the duties and responsibilities performed by an employee. OPM's 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. An OPM appeal decision classifies a real operating job/position and not simply the JD/PD. In the appellant's case our decision is based on the actual work assigned to and performed by the appellant to determine the proper pay system.

Our review disclosed the appellant's PD is inaccurate because he does not "off-load, check, store, select, pack, and ship stock as directed and required;" does not participate in doing inventories; does not locate and re-warehouse materials, commodities, or equipment; and is not required to have knowledge of warehousing practices regarding movement and storage of stock using pallets, skids, and other warehousing tools and equipment. As discussed later in this decision, such duties and knowledge needed to perform them are required of and done by private contract employees. Therefore, the appellant's PD of record does not meet the standard of adequacy addressed on pages 10-11 of the *Introduction*, and the agency must revise the PD to reflect our findings.

Job information

The appellant is the sole Shelf Life Coordinator for the [name of appellant's organization]. As such, he monitors and tracks the shelf-life of 784 items used by Federal agencies including general cargo, hazardous materials, and items used in firefighting activities. His primary duties involve: (1) Daily updating shelf-life material information recorded in several data bases including the Warehouse Management System (WMS), and the Open Warehouse Dashboard System. Using these systems he researches shelf-life codes and the cost price of items, performs extension updates, determines inventory locations, and develops shelf-life reports. He prepares and submits Damaged Stock Reports for expired shelf-life material to be disposed of, and

coordinates with the Quality Control Section to obtain authorization for extending or disposing of items requiring laboratory testing; (2) Administers the Shelf-life Hotline which involves receiving and responding to all inquiries from GSA's National Customer Service Center (NCSC) on questions regarding shelf-life items (e.g., extensions) held by agencies. Using an automated data records system (FSS-19) he researches responses, checks inventory locations, verifies shelf-life codes and expiration dates, and determines the source of supply for selected items; (3) Performs Shelf-life surveys using the Open Warehouse Dashboard automated records system to ensure controlled supplies are rotated and issued on a "First-in-First-out" (FIFO) basis. This includes researching Shelf-life expiration dates so that oldest items are selected first for shipment, and that the manufacture dates of newly received items are recorded in FIFO sequence. The preceding duties are the critical elements recorded in the appellant's current performance standards, i.e., Associate Performance Planning Worksheet. In performing some of his duties, particularly physically checking locations and labeling shelf-life items stored in the warehouse, the appellant operates an electric Hyster Reach-lift forklift with a capacity of less than 10,000 pounds.

To perform the above duties the appellant must have thorough knowledge and expertise in shelf-life codes and GSA's supply operations and automated data management systems, the ability to prepare daily reports and research and analyze statistical data, knowledge of hazardous material safety handling procedures, and knowledge of manufacturing data and regulations associated with managing assets coded with shelf-life constraints. Because the appellant possesses comprehensive knowledge of shelf-life management procedures and all matters relating to control of shelf-life items, he works very independently with little or no technical guidance from his supervisor. Work is generally reviewed for adherence to agency shelf-life procedures and response to customer inquiries.

In reaching our appeal decision, we have carefully reviewed all information furnished by the appellant and his agency including his official JD which is incorporated by reference into this decision. In addition, to help decide the appeal we conducted a telephone interview with the appellant and, due to the unavailability of his immediate supervisor who was on overseas travel, interviewed his second-level supervisor [name of supervisor's organization].

Pay category determination

The agency coded the appellant's job to the Materials Handling, 6907 occupational series, titling it Materials Handler, but the appellant believes his position should be classified in the GS pay category and classified in the GS-2005 series at the GS-7 grade level. For the reasons discussed below, we find the appellant's position is not covered by the Federal Wage System (FWS).

Jobs coded to the 6907 series perform work involving receiving, storing, and assembling for issue, shipment, and distribution, a wide variety of bin and bulk supplies, materials, equipment, and commodities using mechanized, automated, and manual material moving equipment, devices, and systems. The work requires general knowledge of the methods used in processing, handling, and storing of materials and equipment through a supply facility; the ability to log receipt, storage, and shipment data; and the ability to use manual or mechanized equipment to move, stack, bin, and position materials and equipment. The work also requires the ability to

organize, arrange, and remove stock in storage areas in accordance with established procedures to prevent damage, deterioration, and loss. Most work requires the incidental or regular use of fork-lifts and motor vehicles. However, in order to be covered under the FWS, the paramount requirement to perform the primary duties of the job must be trades, crafts, or laboring experience. The term “paramount requirement” refers to the essential, prerequisite knowledge, skills, and abilities to perform the primary duty or responsibility for which the job has been established. If a position does not meet the preceding FWS coverage requirements, it is subject to the GS even if it requires physical work, if its primary duty requires knowledge or experience of an administrative, clerical, scientific, artistic, or technical nature not related to trade, craft, or manual labor work.

The record shows (and confirmed by the second-level supervisor) that knowledge and skill in trades or crafts to perform the primary duties of the appellant’s job are not required. As previously discussed, the appellant solely performs all duties for monitoring and tracking shelf-life items stored at the [name of appellant’s organization]. In doing so, he performs no work characteristic of Materials Handling, 6907. Our fact-finding disclosed that most of the materials handling work at [name of appellant’s organization] is performed by 49 GSA contract employees employed by [name of private contractor]. These employees receive, document, store, rotate, inventory, pull, assemble/pack for issue, move and ship a wide variety and number (exceeding 4,000 items) of bin and bulk supplies, including hazardous materials and shelf-life items. In carrying out the work they utilize material handling equipment and machinery such as forklifts, pallets, and skids. In contrast to materials handling knowledge and skill, to perform his primary duties the appellant applies the full scope of knowledge of technical supply support work and operations to monitor and control all shelf-life items. The second-level supervisor stated that in order to perform his duties, the appellant must have a thorough knowledge of shelf-life procedures and governing regulations and software, customer service skills, and a general knowledge of supply warehouse and storage facility processes. Although the appellant operates a forklift to reach, move, and label shelf-life items, these duties are in support of and ancillary to his primary duties for monitoring and tracking such supplies, and thus do not impact the pay category of the position.

We find the appellant does not apply knowledge and skills of trades and crafts to perform his primary duties. Consequently, the position is not covered by the FWS and is appropriately placed in the GS.

Series determination

The appellant’s primary duties require technical knowledge of supply activities and shelf-life program requirements, regulations, and procedures. In performing his duties he ensures shelf-life items are properly monitored and controlled within the agency’s supply and storage facility program, including checking records for their inventory, storage, rotation, receipt, and control. We find these duties favorably compare to positions classified in the Supply Clerical and Technician Series, GS-2005. This series includes positions involved in supervising or performing clerical or technical supply support work necessary to ensure the effective operation of ongoing supply activities. It requires knowledge of supply operations and program requirements and the ability to apply established supply policies, day-to-day servicing

techniques, regulations, or procedures. Similar to the appellant's position, GS-2005 supply clerks and technicians perform work in a wide range of systematized supply operations such as performing records functions in inventory, storage, cataloging (in the appellant's case cataloging shelf-life general supplies, hazardous materials, and fire items), and performing monitor/control processes. Comparable to GS-2005 positions, the appellant oversees shelf-life stock; adjusts shelf-life item account records; searches catalogs and records regarding extensions of particular shelf-life items; contacts customers and responds to inquiries from the NCSC on shelf-life items; prepares a variety of documents and reports on controlled shelf-life items (particularly disposable and hazardous materials) to ensure FIFO; maintains an accurate accounting and reporting system on all shelf-life property at [name of appellant's organization]; and regularly operates a computer to perform records search, data input, and data corrections on shelf-life stock.

Decision

The appellant's position is assigned to the GS and classified in the Supply Clerical and Technician Series, GS-2005. The agency must develop a new PD describing the appellant's duties and responsibilities in the FES format, and exercise its original classification authority to determine the proper title and grade of the appellant's position by application of the Position Classification Standard for Supply Clerical and Technician Series, GS-2005. If the appellant disagrees with the agency's final classification, he may file a new appeal with OPM.