

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



Philadelphia Oversight Division
600 Arch Street, Room 3400
Philadelphia, PA 19106-1596

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

Appellant: [appellant's name]

Agency classification: Supervisory General Supply Specialist
GS-2001-10

Organization: Supply and Services
Logistics Division
Deputy Commander for Administration
U.S. Army Medical Department Activity
[location]

OPM decision: Supervisory General Supply Specialist
GS-2001-10

OPM decision number: C-2001-10-01

Robert D. Hendler
Classification Appeals Officer

/S/ 5-15-98

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 December 11, 1997, the Philadelphia Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant's name]. His position is classified currently as Supervisory General Supply Specialist, GS-2001-10, position description (PD) #80660. The appellant functions as Chief, Supply and Services, over the Medical Materiel, Storage and Distribution, Facilities and Equipment Management, and Services. The appellant initially appealed his position (Supervisory Supply Systems Analyst, GS-2003-10, PD #5217) to his agency (Defense Civilian Personnel Management Service [CPMS]). The agency decision of November 5, 1997, changed the series and title of the position. PD #80660 contains the same major duties and responsibilities as PD #5217, but reflects the changed title and series. On January 28, 1998, the appellant assumed responsibility for supervising the all military staff of the Medical Maintenance Branch. The position is in the Supply and Services Branch, Logistics Division, U.S. Army Medical Department Activity (MEDDAC), [loaction].

General issues

In his December 7, 1997, appeal letter, the appellant stated he disagreed with the CPMS evaluation of his: (1) facilities management program responsibilities; and, (2) supply management work at Levels 1-6, 8-1, and 9-1. A telephone audit with the appellant on April 16, 1998, confirmed that he was not contesting the change in series or title of his position, and did not disagree with the application of the General Schedule Supervisory Guide to his supervisory duties and responsibilities.

Integral to the appellant's appeal rationale is the fact that his previous position, limited to his current supply management functions, was classified at the GS-10 level. It was evaluated at Level 1-7. He questioned how his current position, with supervisory authority over a Supervisory General Supply Specialist, GS-2001-9 position, could be evaluated at Level 1-6, the same level of knowledge credited to the subordinate position, and questioned "how can my knowledge decrease after 10+ years experience." The appellant, his supervisor, and other individuals interviewed as part of our appeal fact-finding process stressed the success the appellant has achieved in developing and obtaining funding for facility construction, maintenance, and repair projects. They contrasted his achievements with those of facility managers at other MEDCOM activities who occupy higher graded positions.

These submissions have raised procedural issues warranting clarification. The classification appeal process is a de novo review that includes a determination as to the duties and responsibilities assigned to the appellant's position and performed by the appellant, and constitutes the proper application of PCS's to those duties and responsibilities. All positions subject to the Classification Law contained in title 5, U.S.C. must be classified in conformance with published position classification standards (PCS's) of OPM or, if there are no directly applicable PCS's, consistently with PCS's for related kinds of work. Therefore, other methods or factors of evaluation, such as comparison to other positions that may or may not be classified correctly, such as the appellant's former position or facility manager positions at other MEDCOM activities, are not authorized for use in determining the classification of a position. It is an established classification principle that only the effect of properly performed work is to be considered in the classification appeal process. Therefore, the size of the appellant's workload and the quality of his work, are not germane to the classification appeal process. They are matters covered by the performance management and awards programs.

OPM PCS's must be applied within the confines of the position classification theories, principles, and practices established by OPM. The Introduction states that:

Some positions involve performing different kinds and levels of work which, when separately evaluated in terms of duties, responsibilities, and qualifications required, are at different grade levels. . . .

In most instances, the highest level of work assigned to and performed by the employee for the majority of time [emphasis added] is grade-determining. When the highest level of work is a smaller portion of the job, it may be grade controlling only if:

- The work is officially assigned to the position on a regular and recurring basis;
- It is a significant and substantial part of the overall position (i.e., occupying at least 25 percent of the employee's time); and
- The higher level of knowledge and skills needed to perform the work would be required in recruiting for the position if it became vacant.

In evaluating positions that perform work in more than one occupational series, we must apply the appropriate published position classification standard (PCS) to each set of duties. The final grade of the position is then determined by mixed grade principles and practices. For example, a position that spends 25 percent or more of the time on supervisory work, and the remainder of the time on personally performed work, must have each distinct set of duties evaluated separately. The final grade of the position is the highest level of work performed 25 percent or more of the time that fully meets established mixed grade requirements, e.g., excluding work performed in the absence of another employee.

Level of knowledge alone is not automatically grade distinguishing as posited by the appellant. The *Classifiers Handbook* explains this point in its illustration of factor level relationships for positions covered by the Factor Evaluation System (FES). For example, in technical work, positions at the GS-5, GS-6 and GS-7 grade levels may all be evaluated properly at Level 1-4. It is the levels credited for the other eight factors that are different, resulting in the differing point totals that place each of the positions in their respective grade level point ranges.

We have evaluated the work assigned by management and performed by the appellant according to these position classification requirements. In reaching our decision, we carefully reviewed the information provided by both the appellant and his agency, including the appellant's PD of record, certified by the appellant and his supervisor as current and accurate. We obtained additional information during a telephone audit with the appellant on April 16, 1998; a telephone audit with the

appellant's supervisor, Major [name], Chief of Logistics, on April 24, 1998; a telephone interview with Major [name], Chief of Resource Management, on April 27, 1998; telephone interviews with Colonel [name], Commanding Officer, [name] DENTAC, Major [name], Officer in Charge, [name] Veterinary Command (VETCOM) activity, and [name], Northeast Regional Coordinator, Technical Assistance Team, MEDCOM, on April 28, 1998; a telephone interview with Lieutenant [name], U.S. Army Health Facility Planning Agency, on April 30, 1998; a telephone interview with [name], Facility Director, North Atlantic Regional Medical Command (NARMC), on May 4, 1998; and, work examples provided by the appellant at our request. Our fact-finding confirmed the PD of record contains the major duties and responsibilities assigned by management and performed by the appellant and is hereby incorporated by reference into this decision.

In his appeal rationale to his agency, the appellant questioned whether his position was classified consistently with what he believed to be similar positions. He and other people interviewed during our fact-finding process claimed his position was not classified consistently with other MEDCOM facility manager positions. Like OPM, the appellant's agency must classify positions based on comparison to OPM standards 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.

If the appellant considers his position identical to, so similar to, or related to others that they warrant the same series, title, and grade as assigned his position by this decision, he may pursue this matter by writing to the cognizant agency personnel office. In so doing, he should specify the precise organizational location, series, title, grade, duties, and responsibilities of the positions in question. The agency should explain to him the differences between his position and the others, or classify those positions in accordance with this appeal decision.

Position information

The appellant functions as Chief, Supplies and Services at the MEDDAC. Recent organizational information provided by the appellant's supervisor shows that medical equipment repair staff were moved under the appellant's supervision subsequent to the CPMS appeal decision. The current Facility Management Branch staff directly supervised includes: (1) a Maintenance Worker, WG-4749-10 and a Carpenter, WG-4607-9, who are carried on the [name] Department of Public Works table of Distribution and allowances (TDA); (2) a Facility Management Assistant (OA), GS-303-5; and the E-7 head of the Medical Maintenance Branch. The appellant functions as the second level supervisor over a Supply Technician, GS-2005-6, an E-6 Medical Maintenance "Shop Foreman," an E-4 Work Order Clerk, and three E-4 Medical Maintenance Technicians. The Material Branch Supervisory General Supply Specialist, GS-2001-9 reports to the appellant and supervises a staff of four Supply Technicians, GS-2005-6 and one Supply Technician, GS-2005-5. The Storage and Distribution Section Materials Handler Supervisor, WG-6907-4 reports to the appellant and supervises a staff of four Materials Handlers (MVO), WG-6907-5.

In addition to the [name]MEDDAC, the appellant provides supply support services to: (1) the [name] Dental Activity (DENTAC) and VETCOM activity; (2) [name] Arsenal and [name] Army Depot Health Care Clinics; (3) four Military Entrance Processing Stations (MEPS) covering [names of four States] and parts of [name of State]; and, (4) a wide range of other units in that same geographic area including Army Reserve Officer Training Commands, Reserve and National Guard units and equivalent disbursed activities. These services include medical, surgical, pharmaceutical and related specialized supplies, and administrative supplies. The Medical Equipment personnel support medical equipment within this geographic area.

Pharmaceutical, medical, and surgical supplies primarily are obtained by requisitioning against Prime Vendor contracts negotiated through MEDCOM. Other supplies are obtained through access to General Services Administration and U.S. Department of Veterans Affairs contracts. The credit card program covers purchases of up to \$2,500. If the purchase exceeds \$1,000, quotes are requested for cost reasonableness. The [name] contracting office is used for purchases over the credit card threshold which, according to the appellant, seldom occurs. Typical purchases are services such as housekeeping and copier maintenance. The appellant is responsible for providing nonmedical supplies for serviced activities, e.g., office supplies for the MEPS, stocking war reserve material, e.g., for medical chemical defense, and training support, e.g., linen both for the MEDDAC and training units using the [name] laundry contract.

The appellant provides facilities support services to 18 buildings comprising the MEDDAC, DENTAC, and VETCOM activity. [name] Ambulatory Health Care Center, originally built as a 20-bed hospital, consists of almost 61,000 square feet. Other larger buildings include the [name] Dental Clinic (18,745 square feet), P-36 housing the [name] Preventive Medicine and other functions (17,548 square feet), the Troop Medical Clinic (16,198 square feet), and P-11050B occupied by the Logistics Division (15,843 square feet). Four other buildings range in size from approximately 4,000 to 4,500 square feet, another three range between 3,000 and slightly more than 3,500 square feet, three range between 2,000 and just less than 3,000 square feet, and three range between slightly less than 900 to slightly more than 1,800 square feet. The facilities total approximately 170,000 square feet. The buildings are scattered throughout the post. For example, MEDDAC administrative offices are approximately four to five miles away from the main clinic. The MEDDAC operates 24 vehicles, 2 of which are ambulances. They are serviced through [name] under a support agreement.

The MEDDAC staff includes approximately 150 military employees; 60 officers and 90 enlisted. About 25 to 30 are physicians and 20 are nurses. The civilian population is approximately 220. About two-thirds of both military and civilians are engaged in direct patient care. There are approximately 30 to 35 volunteers and 25 contractor health care providers. The MEDDAC functions include providing outpatient specialty care and clinical services, including same day surgery performed under other than general anesthesia; immediate care (including ambulance service); pediatrics; obstetrics and gynecology (OB/GYN); podiatry; audiology; pathology (primarily blood work); diagnostic radiology; optometry; community nursing; occupational health; behavioral health; physical therapy; orthopedics; and pharmacy. The MEDDAC provides typical clinic diagnostic services. For example, radiology performs x-rays, but does not have CAT scan or MRI capability. Podiatry performs surgical procedures at the local hospital. Child births also take place at the local hospital. Preventive

medicine consists of approximately 12 to 13 FTE of family practitioners and about 3 pediatricians. Behavioral health provides outpatient counseling and screening services. The pharmacy also services military retirees in the area, and dispenses commercially formulated drugs. There are some extended clinic services, e.g., same day surgery not requiring general anesthesia.

The DENTAC operates 38 chairs at [name], 18 chairs at the [name] Center, and one chair for an emergency after hours clinic. The staff consists of approximately 75 to 80 employees, including 19.5 FTE of dentists, approximately 10 dental hygienists, between 2 and 3 dental laboratory technicians, approximately 18 dental assistants and 10 secretarial/receptionist support staff, and 6 contract employees, five of whom are dentists. The DENTAC provides comprehensive dental care to the 10,000 military personnel assigned to the post, provides reservist mobilization mission and emergency services. Dental laboratory work is full range, but limited in volume since a great deal is sent out to a central laboratory at Ft. Gordon, GA.

The VETCOM activity provides services throughout the same geographic area as is covered by the appellant's supply program, performing such functions as inspecting food at processing plants and military facilities. The activity provides comprehensive veterinary service to the six military working dogs and strays found on the post. Military members' animals receive outpatient preventive care. The staff consists of 12 enlisted personnel who perform animal technician and food inspection duties, a veterinarian (Officer in Charge), three non-appropriated animal technicians, and a non-appropriated fund veterinarian who is employed when the staff veterinarian is absent. The VETCOM is in the process of replacing the facility currently located in a condemned World War II structure. The proposed 6,000 square foot facility has an estimated cost of \$1.1 million. It will house the veterinary clinic, the stray animal holding area, and administrative offices. The appellant is assisting the activity in developing the project justification, providing guidance on regulatory design requirements, and functioning as a conduit of information to technical engineering and design personnel.

The appellant provides facility support services to the [name of Arsenal] and [name of Depot] sites, working with their respective Departments of Public Works (DPW's) on facility issues. Projects less than \$25,000 are handled in-house through the DPW. NARMC funds projects from \$25,000 up to \$200,000 from NARMC funds, determining which projects to fund within their assigned 21 state area. MEDCOM controls and funds projects exceeding NARMC authority up to \$1.5 million. The appellant works with facility users to develop costs and justify projects, and acts as liaison with engineering organizations and contractors through all project phases; i.e., from design through final acceptance, raising user concerns and acting as the user accepting official.

Series, title, and standards determination

The agency has determined the appellant's position is covered by the General Supply Series, GS-2001, is titled properly as Supervisory General Supply Specialist, and that the appellant's personally performed supply program work is evaluated properly by application of the Grade-Evaluation Guide for Supply Positions (GEGSP). The appellant has not disagreed with these determinations, with which we also agree based on the grade level analysis that follows.

The agency has applied the Facility Management Series, GS-1640 to evaluate the appellant's facilities management work, and the General Schedule Supervisory Guide (GSSG) to evaluate the appellant's supervisory duties. The appellant does not disagree with these determinations. We also find them appropriate based on established series determination and titling practices. Accordingly, the appellant's position is allocated properly as Supervisory General Supply Specialist, GS-2001.

Grade determination

Evaluation using the GEGSP

The grade level of GS-2000 Group two grade interval administrative positions are determined by applying the criteria contained in the GEGSP. The Guide is in Factor Evaluation System (FES) format. Under the FES, positions are placed in grades on the basis of their duties, responsibilities, and qualifications required as evaluated in terms of nine factors. Each factor is assigned a point value based on a comparison of the position's duties and responsibilities with the factor level descriptions and/or benchmarks in the PCS. The factor level descriptions assign point values which mark the lower end of the ranges for the indicated factor levels. For a position to warrant a given point value, it must be fully equivalent to the overall intent of the factor level description. If the position fails in any significant aspect to meet a particular factor level description in the PCS, the point value for the next lower level must be assigned unless the deficiency is balanced by an equally important aspect which meets a higher level. The total points assigned are converted to a grade level by use of the Grade Conversion Table in the PCS.

As clarified during the telephone audit, the appellant disagreed with the agency's evaluation of Factors 1. In his appeal letter, he also questioned the analysis of Factors 8 and 9, but did not take issue with the remaining factors. We carefully evaluated the levels assigned to the remaining factors, and found them appropriate. Our evaluation of the appellant's position, therefore, focuses on Factors 1. We also will address his comments regarding Factors 8 and 9.

Factor 1, Knowledge required by the position

Factor 1 measures the nature and extent of information or facts which the workers must understand to do acceptable work (e.g., steps, procedures, practices, rules, policies, theories, principles, and concepts) and the nature and extent of the skills needed to apply those knowledges. To be used as a basis for selecting a level under this factor, a knowledge must be required and applied.

At Level 1-6 (950 Points), employees use practical knowledge of a wide range of well-established and commonly applied supply principles, concepts, and methodologies in one or more of the technical supply specializations (inventory, packaging, storing/distributing, or cataloging) or of supply program operations, when such work requires the application of some judgment and analysis to provide services or resolve problems. They perform recurring kinds of assignments, operations, and/or procedures in providing services and resolving issues and problems of a procedural nature in supply operations, planning, or program management. The work requires using knowledge of established supply systems in weighing the impact of variables such as cost, existing policies and procedures, data

processing requirements, and other issues that influence the course of action taken. They search for and analyze information; trace sequences of transactions to resolve questions; prepare entries for supply record systems; provide supply information, reports, and services; and recommend actions to eliminate problems involved in delivering services to supply customers or in implementing policies.

Some employees in staff level or quality control positions use knowledge at this level to perform analytical assignments involving specific issues associated with supply management or operations, or to study and recommend solutions for a segment of a broad study involving several issues or problems. Typical areas of concern are existing policy, work procedures, work methods, data integrity, or developing requirements for assigned items of supply, and may involve elements of work in other organizations, such as contracting and procurement, data processing, accounting, or those receiving supply support.

Illustrative of Level 1-6 work is providing supply support for the surgery and inpatient care departments in a hospital, including: (1) ordering and stocking a variety of technical supplies ranging from common administrative and medical support materials through surgical instruments and surgical support equipment (e.g., heart-lung machines, X-rays, and supporting supplies such as film); (2) maintaining accountability records for non-expendable materials, tracing acquisition sources and methods, resolving problems associated with timely deliveries and lead times, arranging for disposal of surplus and excess property and monitoring the operations and records of storerooms and distribution points, including stock levels, rates of usage, reorder points, and requests for new items; and, (3) resolving problems through cataloging, inventory, and acquisition channels involving new or unique surgical equipment and related items peculiar to the missions supported. The employee coordinates requirements with users, seeks assistance in identifying and locating required items, resolves user problems associated with obtaining and maintaining stocks, and prepares written analyses of activities and problems with recommendations for solution for high level supply management.

In contrast, work at Level 1-7 (1250 Points) requires knowledge of a broad range of supply program relationships or significant expertise and depth in one of the specialized fields of supply operations. Assignments require knowledge of specialized methods and techniques to analyze and evaluate the effectiveness and efficiency of supply programs and/or operations. The employee at this level applies a depth of knowledge developed from extensive experience in one or more areas of supply operations or management programs. The work requires the employee to analyze independently and resolve difficult issues and problems in the assigned area of responsibility involving, for example, supply processes, work methods, supply data management, or day-to-day operational procedures.

At this level, employees often use knowledge of interrelated supply processes to: (1) coordinate the objectives and plans of two or more specialized supply programs, and/or two or more independent organizations receiving local supply support (e.g., regional office, outpatient clinic, or medical center); (2) provide options in study recommendations to allow for differing or conflicting program requirements; (3) develop and/or implement procedures and practices to cover multiple supply objectives including inventory management of the supply stock fund for expendable and

nonexpendable items; or, (4) serve on interagency or interorganization committees and groups to identify and resolve, or to assign responsibility for resolving supply issues.

This level of knowledge is also used in supply program planning at a major organizational level. Employees interpret policy direction for specific operating requirements. They develop guidance for applying supply policy, procedures, techniques, equipment, and methods to a variety of work situations involving various degrees or levels of supply controls. This level is used further in responding to problems or questions involving implementation of supply guidelines at lower levels. Employees at this level are commonly considered the major authoritative source of knowledge for organizations supported by the local supply office, about the overall supply program or one of the technical supply specializations, and for interpreting policy originating from higher organizational levels. They: (1) develop and/or recommend new or revised local directives, policies, and implementing instructions; (2) provide authoritative interpretations and guidance to management officials and other supply specialists at the same and lower levels in the organization; (3) resolve issues involving conflicting program requirements; and/or, (4) review operating supply programs for adequacy, efficiency, and need for improvement.

Employees using this level of knowledge commonly consider and recommend several alternatives. They must evaluate variables such as availability of materials, relationships with other programs, and cost-benefit considerations. They also consider administrative processes such as: (1) the status of funds for purchases; (2) the schedule and rate of progress for assembly and delivery; (3) conflicting requirements between ongoing and new programs; and, (4) similar considerations where the employee must make decisions about priorities and allocation of resources.

Illustrative of Level 1-7 is using knowledge in a variety of technical supply operations and general supply support programs to perform independently work such as resolving issues and controlling actions in an inventory management function for a complete category of materials such as electronic parts, a major commodity such as computers, or a complete system such as a major military vehicle, a naval fire control system, or equipment for physical science laboratories. The employee approves recommendations made by users and/or lower level inventory management employees to increase stock levels for components or subassemblies, authorize significant changes in expenditure and stocking levels based on order and usage records, and meet with groups of users and suppliers to arrange for or modify stock levels, storage points, acquisition lead times, and units of issue. The employee participates in original provisioning conferences and establishes inventory controls for complete systems, subassemblies, and parts.

The appellant's initial appeal rationale to his agency paraphrased sections of the Level 1-7 grade level definition, claiming that he: (1) is responsible for total supply management functions in an assigned geographic area; (2) deals with all classes of supply; (3) is knowledgeable of "numerous supply and financial automated systems" and their interfaces; (4) plans and coordinates objectives, conducts studies, recommends changes in overall supply operations; and, independently resolves conflicting program requirements, including "but not limited to, changing/improving the overall supply operation, resolve automated system problems, increase supply service to enhance customer satisfaction/service, reduce costs, develop and implement new policies and procedures to increase our supply and

equipment support, which includes other responsibilities such as procurement and financial duties.” The appellant claimed that he: (1) is responsible for the stock fund and manages the organization’s entire supply budget, the medical supply activity, storage and distribution, inventory management and linen management; (2) develops, recommends, and executes “new and revised directives, policies, instructions, current and new program requirements; (3) provides authoritative interpretations and guidance, provides technical advise; and, (4) resolves “conflicting program requirements by coordinating solutions with Command staff elements, internal staff, and other affected areas.” The appellant stated he: (1) identifies the need for improvement, “review[s]/recommend[s] alternatives and execute[s] such determinations independently; and, (2) is”:

considered the organization’s Supply Management expert. I serve on numerous committees and working groups to advise, identify and resolve potential problems/conflicts concerning work methods, supply processes, etc. Responsible for short and long term goals/planning of the organization’s supply management account. This includes, but is not limited to equipment replacement/modernization, budget forecasting, recommending cost saving initiatives, staff training requirements, and implementation on such issues. This is accomplished through careful coordination with our higher headquarters, installation sources, Command Staff elements, supply staff and our supported customers.

Challenging the agency’s analysis of his work, the appellant claimed:

I implemented and manage the Materials Distribution System (MDS) for medical and nonmedical (MATCATE) supplied to Linen Management. This program was such a success that I was asked by MEDCOM to implement the program at Ft. Campbell, Ky. This is one of many initiatives that have been utilized throughout MEDCOM. I am responsible for the Quick Supply Center (QSC), Medical Gas Management, Property Management, and Facility Management. To manage these programs requires a broad knowledge of numerous automated systems and their relationship with other system, i.e., Defense Medical Material Logistics System (DMMLS), and modules within that system, i.e., Forward Customer Support (FCS) and Facility Management; Theater Army Medical Material Information System (TAMMIS); the Medical Surgical Prime Vendor System (PV), Army Medical Property Accountability System (AMEDPAS), and the Remote Frequency (RF) LAN and their relationship with other Supply, Inventory and Financial Systems. That is why I am responsible for numerous ‘supply programs’ de-pendent upon ones interpretation of ‘supply programs.’ There is no mention of the DMMLS Facility Management Module that keeps a running inventory of our Real property (\$18+M) preventive maintenance schedules/maintenance records and Financial data.

The appellant stated that he is involved in supply program planning as a major organizational level since:

I am constantly providing technical advice to MEDCOM, North Atlantic Regional Medical Command (NARMC), local commanders, contractors, and others within our geographical support regional in the supply and facility management arena on such matters as project planning and implementation, cost saving initiatives, suggestions for improvement. . . . Classifier states that the appellant “does not furnish advice and guidance to several of the agencies Supply Depots.” Again, a determination based on one key word “Depots.” For one thing “Supply Depots” are seldom used as a source of supply (where only 8-10% of our procurement actions are processed annually) and have become a thing of the past due to Governmental change and cost savings initiatives. This has also occurred within the Contracting and Financial fields where most of this type work is accomplished within my organization. I deal directly with our primary sources of supply, i.e., Prime Vendor, Toolbox, Job Order Contacting (JOC), other local contractors.

The position classification process requires that the intent of PCS's be discerned so they may be applied properly. All occupations change over time, some more rapidly and profoundly than others, but the fundamental duty and responsibility patterns and qualifications required within an occupation generally remain stable. Thus, careful application of the appropriate PCS to the work performed should yield the correct grade. Any duties not specifically referenced in the PCS still can be evaluated by similar or related duties that the PCS does describe, and with the entire pattern of grade level characteristics.

The GEGSP, published in July 1992, recognizes fully both depot and non-depot supply work. Although the number of storage depots within the Federal government has decreased in number, the planning and analysis to furnish supplies, equipment, material, property and certain services to support agency missions continue. For example, while fewer depots receive, store, issue and perform similar traditional depot operations, major agency inventory and supply control points determine broad agency supply, equipment, material and other support needs, and provide for them through contractual arrangements. The appellant's prime vendor and other cited contracts reflect this environment in which most items required are obtained through contracts negotiated by depot-level equivalent organizations, e.g., the Prime Vendor and Toolbox contracts controlled by MEDCOM. While the appellant's medical supply point has geographic responsibility, this mission must be viewed within the context of the GEGSP.

The breadth, depth, and complexity of the appellant's supply program compare favorably with some aspects in the previously cited Level 1-6 work illustration. However, he deals with a more restricted range of medical instruments and support equipment than found in a hospital providing a full range of surgical and inpatient services. The appellant handles the common administrative and medical support items in the illustration, e.g., items used in the MEPS, Preventive Medicine, and other components providing routine physical examinations and medical care. However, the limited surgical and specialty care mission of the MEDDAC, although supplemented by the DENTAC and Veterinary Activity demands, reflect a supply program less technologically demanding than found at Level 1-6. That is, although there are X-ray and similar diagnostic equipment, the more sophisticated medical support equipment envisioned in the illustration, such as heart-lung machines and equivalent inpatient

diagnostic equipment, such as MRI's and CAT Scans, are not present due to the medical mission functions typically vested in a hospital that are not present in the MEDDAC clinic environment. The appellant's technical equipment support functions do not routinely include dealing with the new or unique surgical equipment and equivalent supply issues found at Level 1-6.

The geographic dispersion and variety of organizations serviced by the appellant, however, involve supply service coordinating issues and demands not present in supporting the single location in the illustration; i.e., a hospital's inpatient care departments and surgery. There are distinctions among the site programs supported, e.g., veterinary medical; dental medicine; occupational medicine in industrial environments, including Watervliet and Seneca; MEPS, ROTC, Reserve, and Guard support; and the full range of military and family member clinic services. These program variables present the variety and depth of issues requiring the breadth of knowledge and skill found at Level 1-6. For example, the appellant's pharmaceutical storage study, addressing the effective use of storage space, personnel resources, and controlled substance procedures and record keeping reflect the analysis of current policy, work procedures, work methods, accountability, and interaction with other organizations typical of Level 1-6. The appellant's work in developing and publishing local supply program instructions, and creating the Quick Supply Center for program customers also reflect the developing of actions to eliminate problems involved in delivering services to supply customers found at Level 1-6.

We find the appellant does not deal with the depth, breadth, or scope of supply program issues envisioned at Level 1-7. The two or more specialized supply programs, and/or two or more independent organizations receiving local supply support found at Level 1-7 is intended to reflect dealing with the demands of managing unrelated supply program needs. Dealing with differing or conflicting program requirements is intended to cover the demands of analyzing significant programmatic differences, e.g., local program inventory stocking and positioning preferences that differ from higher level supply program item management and administrative cost resource control objectives. In contrast, the appellant manages a single major supply program; i.e., medical and related veterinary and dental, in which regional needs parallel those of the primary users. The interagency and interorganization groups, major organizational level, and similar analytical examples at Level 1-7 contemplate dealing with supply program issues beyond that of direct support to a clinic level environment. That is, dealing with major local supply support issues in a major installation with multiple program requirements, e.g., a wide range of different and unrelated administrative supplies, scientific equipment, troop support, weapons and other military equipment, and housing and a variety of other public works support needs. The appellant's supply support program does not reflect a Level 1-7 environment in which the specialist would provide authoritative interpretations to other supply specialists at the same and lower levels in the organization; i.e., a supply program sufficiently complex so as to require specialists rather than technicians and clerks to manage the program at the same and lower levels. Thus, while the appellant performs many functions that parallel those described at Level 1-7, these functions are performed in a supply program environment substantially more circumscribed than contemplated at Level 1-7. Therefore, this factor is credited properly at Level 1-6 (950 points).

Factor 8, Physical Demands and Factor 9, Work Environment

In his appeal letter, the appellant claimed his position should be credited with “regular and reoccurring (daily) physical exertion; i.e., climbing on roofs, inspecting mechanical rooms and equipment, walking, stooping, exposure to high noise, high temperature, adverse weather, and in some cases physical labor. . . .”

These working conditions pertain to the appellant’s facilities management functions and, therefore, will be considered in our evaluation of that aspect of his position. They may not be considered in the application of the GEGSP to his position.

GEGSP Summary

In summary, we have evaluated the appellant’s position as follows:

Factor	Level	Points
1. Knowledge required by the position	1-6	950
2. Supervisory controls	2-4	450
3. Guidelines	3-3	275
4. Complexity	4-3	150
5. Scope and effect	5-3	150
6. Personal contacts and	}2 b	75
7. Purpose of contacts		
8. Physical demands	8-1	5
9. Work environment	9-1	<u>5</u>
Total points:		2,060

A total of 2,060 points falls within the GS-9 range of 1,855-2,100 points in the GEGSP Grade Conversion Table.

Evaluation using the GS-1640 PCS

This standard covers positions that manage the operation and maintenance of buildings, grounds, and other facilities such as posts, camps, depots, power plants, parks, forests, and roadways. The work requires (1) administrative and managerial skills and abilities and (2) broad technical knowledge of the operating capabilities and maintenance requirements of various kinds of physical plants and equipment. While typically directing work performed by a variety of trades and labor employees and require specialized knowledge of such work, these positions do not have as their paramount qualification requirement an intensive knowledge of the specific trades skills utilized. The GS-1640 PCS uses three factors to evaluate position: (1) Management factors - planning, budgeting, scheduling, coordinating, and utilizing staff, money, and material resources; (2) Technical factors -

scope of equipment operation and repair, and nature of equipment and facilities; and, (3) Personal factors - the ability required to act in management-client relations, and management representation.

The PCS states that in considering the descriptions of levels, the presence or absence of a single feature should not be considered as grade controlling. Some variation will exist because of differences in work situations. Mention of a particular required knowledge or items of equipment at a grade level is not intended to indicate that this is the first level or the only level at which these features occur. Rather, it indicates that at that particular level these features exist on a constantly recurring and significant basis and are illustrative of the breadth of management problems typical of the level.

It is an established principle that determining the intent of a PCS requires consideration of the interrelationship among narrative factors. For example, neither increased independence nor increased difficulty of assignments is meaningful unless each is viewed with the other. The application of this PCS requires that we consider that appellant's organization varies substantially from that described in the GS-1640 PCS in several respects. First, rather than managing a variety of trades and crafts personnel through subordinate working leaders typical of all grade levels in the PCS, most of the appellant's subordinate staff is engaged in supply program operations. The bulk of the facilities work is accomplished through contractor personnel. Second, the appeal record shows that current and near future major renovation and overhaul projects are a result of a decaying infrastructure that preceded the appellant being assigned facility management program responsibility. Third, the GS-1640 PCS includes supply program responsibility previously evaluated by application of the GEGSP, requiring care that we not double credit the same responsibility inappropriately. GS-1640 supply work pertains primarily to physical plant supply support, and not medical operations supply support. Fourth, the roles of the Ft. Drum DPW and other technical engineering organizations must be recognized.

Management factors

The GS-9 grade level includes a significant responsibility for considering the adequacy of facilities. The size of operations requires the development of an annual and long-range program for maintenance with particular emphasis on preventive maintenance. The manager prepares plans and specifications for some alterations, schedules the sequence of operations, directs the assembly of materials, and schedules the staffing required. The manager is required to know inventory procedures and be able to project operating costs to the end of the year based on his estimates of present operating trends. The employee must be able to prepare reports relating to engineering problems. This requires the screening of information to select pertinent facts and the ability to determine when all facts are at hand so that the record is complete in important respects. From time to time the manager may give personal attention to organizing and directing safety and civil defense drills or a driver safety program. At the GS-9 grade level, managers primarily are involved with directing day-to-day operations. The size of the plant is such that the actual operations are supervised by subordinate working leaders but are not so large that the manager does not have the time to devote to the operating details.

In contrast, at the GS-11 grade level the size of the operation and the demands made upon available space require the manager to use knowledge of space utilization in following to match space to functional requirements. The increase in the size and scope of the operation increases the number of technical problems presented to the manager for decision and requires a greater volume of records so that office management plays a larger part in the work. More time is required to coordinate the work of the several shops under the manager's jurisdiction; to organize and conduct formal training courses; to promote and evaluate the incentive awards program; and to emphasize and conduct the agency safety program. The manager must have a thorough knowledge of inventory management procedures, because of the amount of work involved in this operation and the importance it plays in the management control process. Employees must know the operations of the storeroom and the stock levels required for operation under their jurisdiction. Managers must have the capacity to make budget estimates for new operations and prepare requests and justification for new methods and equipment. This requires a knowledge of work production standards for maintenance work in all trades. The manager typically gives instructions to craftsmen through intermediate subordinates, they are still directly interested in and concerned with some special problems, for example, operations that involve or require the movement of heavy or cumbersome pieces of machinery. The size and scope of operations do not permit the manager to devote as much of his time to directing daily operations as at the GS-9 grade level. However, in operating emergencies due to breakdowns of equipment, or other cause, the manager does take personal charge and directs remedial work.

The facility upgrading projects emphasized by the appellant and others interviewed in the course of this appeal must be placed in an appropriate context. Although the appellant is engaged in space utilization planning and renovation and construction projects exceeding those typical of GS-9 grade level maintenance and repair work, other functions typically managed as integral parts of GS-9 grade level programs are not present, e.g., guard and firefighting, and telecommunications operations. The MEDDAC is a tenant activity, and the facilities are owned by [name], and the other host activities, i.e., [name], and [name]. Those activities retain facility control and oversight authorities, primarily through their respective DPW's. The illustrative work situations at all grade levels in the PCS are hospital-based; i.e., a medical facility furnishing a full range of inpatient and outpatient services, for which the facility management position provides 24-hour grounds, buildings, roads, utilities and equipment services.

Recognizing the inherent relationship with *Technical factors*, evaluating *Management factors* requires awareness of the typical physical plant managed at each grade level. The GS-9 grade level discusses providing services to a 185-bed hospital, with a gross floor area of 150,000 square feet, located in a small town. The facility includes a laundry; an automotive maintenance shop servicing seven passenger cars, five trucks, and an ambulance; a heating plant with three 150-horsepower boilers; four elevators; and standby operating equipment, with water, sewage, and electricity provided by public utilities. The appellant's facility does not include an operating laundry, a boiler plant of the scope and size contemplated in the PCS, elevators, or other physical plant support requirements of a 185-bed inpatient medical institution. We find, however, that these weaknesses are offset by the complications of off-site program support to [name] and [name]; preparing requests and justifications for the major projects, e.g., converting sections of [name of clinic] and other buildings for new uses, major roofing replacement projects, the Veterinary activity project; and dealing with the age and deteriorated

condition of some structures. These conditions, and their planning demands, parallel those typical of the GS-11 grade level, but in a more restricted operating environment. The appellant's budget estimates and justifications for new methods and equipment are of a more restricted scale and scope than found at the GS-11 grade level. For example, justifying the funding of two positions at the [name] DPW does not compare favorably with managing a 40-ton refrigeration plant with five walk-in cold storage units, and frequently installing additional refrigeration and air-conditioning equipment; operating three 200-horse power high- pressure boilers for heating, cooking, laundry, cleaning, and sterilizing, and maintaining a standby diesel-electric system to supply those same services; or, servicing a fleet of 15 motor vehicles that are repaired and maintained in-house. The dispersion of buildings stressed by several people interviewed is addressed at all grade levels in the PCS, e.g., the GS-9 work situation describes a hospital with nine permanent-type brick and structural tile buildings on a 100 acre tract. Based on the preceding analysis, we find the appellant's position meets, but does not exceed the GS-9 grade level for this factor.

Technical factors

At the GS-9 grade level, the facility manager is required to give instructions to craftsmen, check drawings, and interpret them as a guide to the craftsmen. They are concerned with the production of steam and have the time to check to insure the smooth functioning of the plumbing, electrical, refrigeration, and air conditioning systems. The plant is of such size that the staff comprises specialized workers such as carpenters, electricians, steamfitters, and operating engineers. To direct and evaluate work, the manager must have a knowledge of the functions and capabilities of these trades and crafts and the materials and equipment with which they work. They may have to determine whether work will be carried out by the staff or by a contractor. Where a contractor is used, the manager must know the contractor's ability to provide services. In either case, while the work is in progress the manager must inspect it for compliance with specifications or standards. The boiler plant is, relatively speaking, the largest and in some aspects the most complicated operating feature. Because of its marked effect on total operating costs, the manager is concerned with the efficiency of fuel combustion; follows up on feed-water treatment to prevent corrosion, and checks problems of steam distribution such as pressure reduction in the lines and pipe covering. Other operations that are given close attention are (1) electrical power supply and related problems, such as power load conditions in various buildings, electric motor sizes and types with relationship to operating requirements, and low voltage equipment maintenance; (2) cleaning work; (3) construction and maintenance of the lawn; (4) sanitary sewer maintenance; (5) guard and firefighting functions including conducting training for guards; and (6) telecommunications operations. The illustration in the PCS shows that the manager typically directs 25 staff years of plant operation and maintenance work, and 5 staff years of protective and other support work, not including contractor work. The station has a fleet of 15 motor vehicles that are repaired and maintained by inhouse personnel.

An important responsibility is the inspection of the building or buildings and grounds to identify and recommend repairs needed by mechanical equipment or structure. In order to maintain service the incumbent is required from time to time to make engineering decisions in emergencies without engineering review. However, the manager at this level usually is not concerned with new

construction or the methods and equipment used in heavy construction. The PCS states that although not grade determining in itself, as a broad general index to the level, gross square foot-age of space assigned is around 150,000 to 250,000 square feet. The PCS cautions that size, in square feet, is to be considered only as a general guide and may be outweighed in determining level in a specific situation by one or more of the elements cited in the introduction, e.g., age and type of construction, size and use made of surrounding grounds, and equipment used in or used in conjunctions with the operations of buildings. Conversely, even though a position may have an area of the typical GS-9 size, if the assignment is significantly weak in one or more of these elements it will be considered for an appropriate lower level.

In contrast, at the GS-11 grade level the size and volume of traffic usually make elevator maintenance a significant part of the responsibility. The automation of elevators with the required control devices represents an important source of technical problems. Managers at this level must have a knowledge of elevator repair problems. Other items which reflect, because of the amount of attention they require, the nature and size of operations at this level are: firefighting and the operation and maintenance of the fire alarm and sprinkler system; the primary and secondary electrical distribution systems, with particular emphasis on the responsibility for interpreting tests of these systems; and the consideration which must be given to technical requirements in buildings maintenance to insure continued structural integrity. In addition to GS-9 grade level operating problems and work, GS-11 grade level operations frequently have added emphasis on roof construction and repair, partition construction, acoustical treatment, upholstery repair, floor equipment maintenance and repair, sheet metal maintenance, and maintenance of refrigeration systems. Another special feature which frequently is associated with this level of work is the responsibility for checking the food service operations or other concessions for compliance with contract requirements. GS-11 grade level positions are predominantly characterized by responsibility for managing buildings and grounds in a specific locality. However, this level also is generally the first level at which positions carry responsibility for the management of Federal buildings in a geographic area. They serve not only as building operations experts but as sources of information on regulations relating to the Federal Supply System; the GSA Communications System; short-order material, or labor and material procurement procedures; standard forms or sources of supply of standard forms; and police regulations and law as related to the work of guards. Typically, gross square footage of space assigned is around 400,000 to 600,000 square feet.

The GS-11 work illustration discusses a facility manager position maintaining and repairing a hospital of 600-bed capacity, working under general administrative direction. The manager prepares budget estimates and, with professional guidance, reviews the mechanical and structural features of the plant in order to effect improvements in the system. The manager directs a plant operations and maintenance staff of 50 employees through section chiefs in charge of the four sections: Buildings and Grounds Section, Utilities Section, Laundry and Dry Clearing Section, and Protective Section. Relatively involved planning is required to coordinate and set priorities for operations and maintenance work. Although work is assigned through the section chiefs, the incumbent checks on the progress of each unit about once a week. The manager supervises new construction, alterations, and improvements ranging in value to \$25,000. This includes the preparation of drawings and estimates for materials and labor required. The employee is responsible for the enforcement of safety

and fire regulations designed to protect the 1,000 patients and employees located at the hospital. The hospital, because of its location, in many ways is most aptly described as a small community. The hospital is located approximately 240 kilometers (150 miles) from the nearest city of 50,000 or more population. The hospital consists of 40 structures with a gross floor area of 13,500,000 centimeters (450,000 square feet) situated on a 200-acre tract. In addition, there is a 10-acre cemetery on the grounds with 1,200 graves. The buildings are varied, ranging from permanent brick structures to a variety of so-called temporary structures including Quonset huts. The climate is mild but is subject to a high rainfall. Because of the scope of operations and isolated location, an adequate stock of supplies must be maintained in a warehouse, and special shops are required, e.g., carpentry, plumbing, electrical, paint, and machine shop.

As discussed previously, the appellant is engaged in new construction and major renovation functions typical of the GS-11 grade level, but for facilities and equipment of lesser scope and complexity. For example, the appellant's position is not responsible for the large boiler plant; air conditioning and refrigeration equipment; elevators and equivalent mechanized equipment; or range of facility support functions (e.g., firefighting, laundry plant, and protective services) typical of the GS-11 grade level. Similarly, while the MEDDAC motor vehicles fleet exceeds that typical of the GS-9 grade level, he is not responsible for directly managing the highly skilled trades personnel as described in all grade levels in the PCS. The GS-11 grade level is predicated upon managing construction, maintenance and repair for the technical functions of the larger physical plant, and support services for the substantially larger staff and inpatient population found at that grade level. The consumer price index shows that the \$25,000 projects referenced during the development of the GS-1640 PCS would equate to approximately \$97,000 in 1998 dollars. While the appellant plays a key role in justifying and overseeing projects that exceed \$25,000 in 1998 dollars, the record shows higher level facility management organizations must review and approve projects over that threshold. The annual facility budget under direct MEDDAC control is approximately \$300,000 and includes the funding of the two Ft. Drum DPW positions. This falls substantially short of the facility budget directly managed in the illustration, including funds for 50 staff years of plant operations and maintenance staff, not including contractor work.

In applying the GS-1640 PCS, we must recognize the decrease in Federal employees and the increase in contractor-provided facilities and other support services throughout the Government. The appellant retains full responsibility for technical operations as discussed previously in this decision. Much of the actual trades work is performed by contractors, either through JOC or Toolbox contracts. Therefore, while the appellant does not directly supervise the scope of trades and craft workload described in the PCS, he exercises non-engineering facility management responsibility for the workload performed by contractors. This responsibility includes assisting MEDDAC, DENTAC and Veterinary activity management formulate facility support needs, develop statements of work; commenting during the design process, functioning as liaison between the contractor and activity management; working with the engineering inspection organization during construction; and preparing paperwork for modifications, change orders, and additional funding. These functions, and responsibility for activities distant from Ft. Drum, offset the weaknesses of the position previously addressed in this decision and permit evaluation of this factor at the GS-9 grade level.

Personal factors

At the GS-9 grade level, managers generally are required to have a facility for expression, in order to explain technical problems to nontechnical people. Typically, normal work relationships with other hospital officials requires the coordination of building services and maintenance with the activities of other services and divisions of the hospital.

In contrast, at the GS-11 grade level, along with technical and managerial skills, the manager is expected to be able to explain the billing system on reimbursable work and to persuade users of service to accept compromise offers. They must have a background of the objectives, history, and development of the program of their agency as a guide in making decisions in more complex situations. In addition to contacts with the medical, dietetic, and other hospital officials, the incumbent also deals with contractors, equipment salesmen, and officials from the national headquarters.

The appellant has the full range of contacts typical of the GS-9 grade level, including advising the sitting on program committees. Based on the host/tenant relationship with Ft.[name], we find contacts with the DPW and other Ft. [name] components are typical of the contacts with the other services and divisions of a hospital. The appellant also has contacts with contractors and officials from higher level organizations described at the GS-11 grade level. The GS-9 grade level, however, does not exclude contractor contact as addressed previously in this decision; i.e., determining whether to contact out work, and inspecting contractor work in progress for compliance with specifications and standards. Therefore, while some of the appellant's contacts appear to exceed those typical of the GS-9 grade level, they do not fully meet the GS-11 grade level. For example, while the appellant regularly deals with NARMC personnel, he does not deal with the full scope of technical issues in GS-11 grade level programs as discussed previously. Because this factor does not meet the GS-11 grade level fully, it must be evaluated at the GS-9 grade level.

GS-1640 Summary

Based on the preceding analysis, we have evaluated the appellant's position at the GS-9 grade level for all factors, resulting in evaluation of the appellant's facilities management work at the GS-9 grade level.

Evaluation using the GSSG

The GSSG is used to grade supervisory work and related managerial responsibilities that require accomplishment of work through combined technical and administrative direction of others; and constitute a major duty occupying at least 25 percent of the position's time; and meet at least the lowest level of Factor 3 in this guide, based on supervising Federal civilian employees, Federal military or uniformed service employees, volunteers, or other noncontractor personnel. The appeal record shows the appellant's position meets these conditions.

The agency has evaluated the appellant's position as follows with which he has not disagreed:

Factor	Level	Points
1	1-2	350
2	2-1	100
3	3-3b	775
4A	4A-2	50
4B	4B-2	75
5	5-3	340
6	6-2b	575
	Total:	2265

Based on our review of the appeal record, we concur and have so credited the position. Our evaluation fully considers the assignment of medical equipment maintenance program responsibilities to the appellant's position. A total of 2,265 points falls within the GS-10 grade level point range of 2,105-2,350 points on the Grade Conversion Table in the GSSG.

Decision

Based on the application of the mixed series and grade classification principles, and titling practices, the appellant's position is classified properly as Supervisory General Supply Specialist, GS-2001-10.