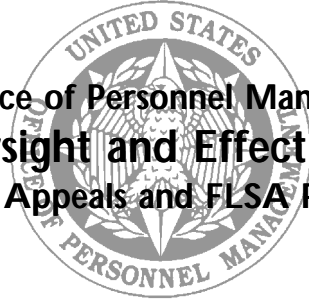


U.S. Office of Personnel Management  
Office of Merit Systems Oversight and Effectiveness  
Classification Appeals and FLSA Programs



San Francisco Oversight Division  
120 Howard Street, Room 760  
San Francisco, CA 94105

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

**Appellant:** [The appellant]

**Agency classification:** Health Technician (Ophthalmology)  
GS-640-7

**Organization:** [The appellant's installation]  
Department of Veterans Affairs

**OPM decision:** GS-640-7  
(Title at agency discretion)

**OPM decision number:** C-0640-07-02

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Carlos A. Torrico  
Classification Appeals Officer

March 17, 2000  
Date

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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).

**Decision sent to:**

[The appellant's address]

[The appellant's servicing personnel office]  
Department of Veterans Affairs

[The appellant's representative]

Deputy Assistant Secretary for  
Human Resources Management  
Department of Veterans Affairs  
810 Vermont Ave NW, Room 206  
Washington, DC 20420

## **Introduction**

On August 17, 1999, the San Francisco Oversight Division of the U.S. Office of Personnel Management (OPM) received a classification appeal from [the appellant]. Her position is currently classified as Health Technician (Ophthalmology), GS-640-7. However, she believes the grade level should be GS-9. The position is located in the [appellant's organization and installation], Department of Veterans Affairs (DVA). We have accepted and decided the appeal under section 5112 of title 5, United States Code (U.S.C.).

## **General issues**

The appellant makes various statements about the agency's evaluation of her position and the classification of similar positions in the DVA which are higher graded. By law, we must classify positions solely by comparing their duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since comparison to standards and guidelines is the exclusive method for classifying positions, we cannot compare the appellant's position to others as a basis for deciding the appeal. Therefore, we have considered the appellant's statements only insofar as they are relevant to making that comparison.

This appeal decision is based on a careful review of all information furnished by the appellant and the agency. In addition, to help decide the appeal an Oversight Division representative interviewed both the appellant and her immediate supervisor by telephone. Both the appellant and the supervisor have certified to the accuracy of the appellant's official position description (PD) number 654-3715.

## **Position information**

The appellant performs various duties to assist in the care and treatment of ophthalmology outpatients, inpatients, and clinic consultations. The primary duties listed in the PD include assisting in surgery, performing numerous tests and procedures, obtaining patient history and providing some direct care, patient education, and assisting in the daily operation of the clinic. Our interviews, the appellant's PD, and other material of record furnish more information about the duties and responsibilities and how they are performed.

The [the appellant's organization] is composed of a supervising Physician, VM-602-15; an Optometrist, VM-665-13; two Health Technicians (Ophthalmology), GS-640-7; and one Program Support employee, GS-303-5.

## **Series, title, and standard determination**

The agency has classified this position in the Health Aid and Technician Series, GS-640, and the appellant does not disagree. As described in the series definition of the GS-640 series coverage standard (dated September 1988 and reissued in HRCD-7, July 1999), positions in that series involve nonprofessional work of a technical, specialized, or support nature in the field of health

or medicine when the work is of such generalized, specialized, or miscellaneous nature that there is no other more appropriate series. Given the miscellaneous nature of duties performed by the appellant, we concur with the agency's determination that the position is appropriately classified in the GS-640 series.

In view of the diversity of positions classified in the GS-640 series, OPM has prescribed no official titles for positions in that series. However, the standard suggests that the title of "Health Technician" can be considered for positions at grade GS-4 and above. Nevertheless, selection of an appropriate title for the appellant's position is at the discretion of the agency. In choosing a title, the agency should follow the titling instructions discussed in section III.H.2. of the Introduction to the Position Classification Standards.

Due to the diversity of positions classified in the GS-640 series, the standard contains no grade level criteria. It directs that nonsupervisory positions be evaluated by reference to grade level criteria in standards for other nonprofessional technical positions in the GS-600, Medical, Hospital, Dental and Public Health Group. To grade the appellant's position, we have cross referenced to the grading criteria contained in the classification standard for the Medical Instrument Technician Series, GS-649, dated October 1990.

Positions in the GS-649 series perform diagnostic examinations or medical treatment procedures as part of the diagnostic or treatment plan for patients. The work involves operating or monitoring diagnostic and therapeutic medical instruments and equipment, and performing related patient care activities. Incumbents of such positions apply knowledge of the operating characteristics of the equipment, and a practical knowledge of basic medical sciences such as human anatomy and physiology. Although the appellant does not operate the types of medical instruments and equipment discussed in the GS-649 standard (e.g., cardiac, ultrasound, hemodialysis), she does perform a variety of ophthalmology tests and procedures using specialized instruments and equipment (including an ophthalmic camera) to perform diagnostic tests of patients' vision, and assists in ophthalmology surgery by arranging and identifying instruments and preparing the patient for the specified surgical procedure. To perform her duties she must be skilled in operating the various instruments and equipment, have a practical understanding of medical data generated by patient/equipment connections, and have a basic understanding of the anatomy and physiology of the eye and of eye disease. These duties consume up to 85% of her work time and are similar to some of the occupational tasks described in the GS-649 standard. Her remaining duties (occupying about 15% of her work time) consist of clerical and administrative support functions and are neither series nor grade controlling. Only duties that occupy at least 25% of an employee's time can affect the grade of a position (Introduction to the Position Classification Standards, section III.J). Therefore, we will not evaluate those support duties in this decision.

### **Grade determination**

The GS-649 standard uses the Factor Evaluation System (FES) that employs nine factors. Under the FES, each factor level description in a standard or guide describes the minimum characteristics

needed to receive credit for the described level. Therefore, if a position fails to 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.

*Factor 1, Knowledge required by the position - Level 1-4 - 550 points*

This factor measures the nature and extent of the knowledge of instruments and diagnostic or treatment procedures the technician must possess, and the nature and extent of skill necessary to apply this knowledge. To be used as a basis for selecting a level under this factor, knowledge must be required and applied.

The knowledge and skills required by the appellant's assigned duties and responsibilities best meets Level 1-4, as described on pages 9 - 12 of the GS-649 standard. Like Level 1-4, the appellant's assigned duties and responsibilities require knowledge and skills sufficient to perform intricate examination or treatment procedures; a basic knowledge of anatomy and physiology (e.g., components of the eye, common eye diseases and their effects in ophthalmology); and skill to apply knowledge in adapting instruments to perform a full range of specialized tests or nonroutine diagnostic or treatment procedures requiring many steps, and various approaches and procedures based on findings in early steps. As described in Level 1-4, the appellant is responsible for performing and documenting numerous specialized tests using a variety of instruments.

The knowledge required by the appellant's assignments does not meet Level 1-5 (pages 12 - 14). At that level the standard describes knowledge of instruments and complex procedures to perform special complicated examinations or treatments for which there are *no* standard instructions and procedures. The record and examples of examinations provided by the appellant reveal that the appellant performs examinations for which there are standard instructions and procedures. The appellant prepares the settings of instruments for ophthalmic surgery and monitors this equipment during surgery; however, this does not fully meet Level 1-5.

This factor is evaluated at Level 1-4 and 550 points are credited.

*Factor 2, Supervisory controls - Level 2-3 - 275 points*

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work.

The appellant's position meets Level 2-3 (page 15) of the GS-649 standard, which is the highest level for this factor described in the standard. At Level 2-3, the supervisor defines the goals, priorities, and deadlines of the work. When working as a team, physicians accept the technician's knowledge of complex procedures. The physician helps employees with unusual situations that

have no clear precedents. At this level, the technician plans and carries out examinations, handles problems and deviations in line with training and accepted practices.

Similarly, the appellant works within defined goals, priorities, and deadlines; and physicians generally accept the appellant's examination results. The appellant conducts assigned examinations independently, and refers unusual situations to the physician.

This factor is evaluated at Level 2-3 and 275 points are credited.

*Factor 3, Guidelines - Level 3-3 - 275 points*

This factor covers the nature of guidelines and the judgment necessary to apply them.

As described at Level 3-3 (page 16), the appellant's guidelines are available but not completely applicable to the work. They include instructions from physicians, written descriptions of examinations, and instrument manuals. At Level 3-3 (which is the highest level for this factor described in the standard), assignments have aspects that require the technician to exercise judgment to select, adapt, or interpret existing methods and practices. Likewise, the appellant uses judgment to assess and correct unexpected results and adapts examination procedures to individual patients. The appellant selects the most appropriate guidelines to calibrate or manipulate instruments.

This factor is assigned Level 3-3 and 275 points are credited.

*Factor 4, Complexity - Level 4-3 - 150 points*

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 4-3 (pages 17 - 18), assignments consist of a variety of duties involving performance of different specialized diagnostic and treatment procedures. Similar to Level 4-3, the appellant interprets a variety of conditions and elements such as patient condition, medication, or instrument performance to be sure of test results. The appellant may change instrument settings based on patient symptoms.

At Level 4-4 (page 18), the work involves diverse and complex technical problems, and decisions involve complicating factors that hinder use of standard procedures and normal alternatives. The appellant's work does not meet Level 4-4. The assigned duties and responsibilities do not typically involve such complications as changing technology, inadequate information about the use and capabilities of new instruments, seriousness of the illness and capacity of the patient, requests for changed procedures, test alternatives, or special studies to meet specific clinical situations. While

the appellant must accommodate the patient's condition, her activities do not fully meet the complexities described at Level 4-4.

This factor is evaluated at Level 4-3 and 150 points are assigned.

*Factor 5, Scope and Effect - Level 5-3 - 150 points*

This factor covers the relationship between the nature of the work; i.e., the purpose, breadth, and depth of the assignment, and the effect of the work products or services both within and outside the organization.

At Level 5-3 (page 19), the purpose of the work is to perform a variety of specialized diagnostic and treatment procedures. These services are provided during regular and recurring critical care situations. The appellant's work best meets this level since she provides regular and recurring technical support for diagnosis and treatment in ophthalmology during examinations and surgery. This affects the well being of the patient. Level 5-3 is the highest level described in the standard for this factor.

This factor is evaluated at Level 5-3 and 150 points are credited.

*Factor 6, Personal Contacts and Factor 7, Purpose of Contacts – Levels 6-2/7b – 75 points*

These factors cover the assigned, recurring personal contacts and their purpose.

The appellant's personal contacts and their purpose are evaluated at Levels 6-2 and 7b (page 19) respectively. Similar to Level 6-2, her contacts are with employees within the hospital, but frequently outside the immediate work unit, and with patients, their families, physicians, nurses, and other professional and technical staff. Like Level 7b the purpose of contacts are to coordinate work efforts (e.g., pre-operative procedures) and resolve technical problems.

These factors are evaluated at Levels 6-2/7b and 75 points are credited.

*Factor 8, Physical Demands - Level 8-2 - 20 points*

This factor covers the requirements and physical demands placed on the employee by the work assignment.

The physical demands on the appellant meet Level 8-2 (page 20) since the work requires regular and recurring physical exertion. The appellant must bend, reach, and stretch to set up equipment, position patients, and move heavy objects. Level 8-2 is the highest level for this factor described in the standard.

This factor is evaluated at Level 8-2 and 20 points are credited.

*Factor 9, Work Environment - Level 9-2 - 20 points*

This factor considers the risks and discomforts that may be imposed by various physical surroundings or job situations.

The appellant's work environment is evaluated at Level 9-2 (page 20). Like that level she has regular and recurring exposure to infectious and contagious diseases, odors, and other risks that require special health and safety precautions. Level 9-2 is the highest level for this factor described in the standard.

This factor is evaluated at level 9-2 and 20 points are credited.

*Summary*

In summary, the appellant's position is evaluated using the GS-649 standard as follows:

Medical Instrument Technician Series, GS-649 (dated October 1990)		
Factor	Level	Points
1. Knowledge required by the position	1-4	550
2. Supervisory controls	2-3	275
3. Guidelines	3-3	275
4. Complexity	4-3	150
5. Scope and effect	5-3	150
6 & 7. Personal contacts and Purpose	6-2/7b	75
8. Physical demands	8-2	20
9. Work environment	9-2	20
Total Points:		1515

The appellant's position warrants 1515 total points which falls within the GS-7 range (1355-1600). Therefore, in accordance with the grade conversion table on page 8 of the standard, the position is properly graded at GS-7.

**Decision**

The appellant's position is properly classified GS-640-7. Position title is at the agency's discretion.