

Department of Defense (DoD)
Civilian Personnel Management Service (CPMS)
Field Advisory Services - *FAS*
Classification Appeal Decision

DoD Decision:	Safety & Occupational Health Manager, GS-018-11
Initial classification:	Safety & Occupational Health Manager, GS-018-11
Organization:	Safety Office Naval Support Activity
Date:	November 25, 1998

Background

On September 25, 1998, the Defense Civilian Personnel Management Service, Field Advisory Services Division, accepted a classification appeal from an employee who is classified as a Safety and Occupational Health Manager, GS-018-11, in the Safety Office of the Naval Support Activity. The appellant appealed the grade level of his position, requesting reclassification to GS-12.

Sources of Information

- Information contained in the appeal file submitted by the appellant
- Information contained in the administrative report submitted by the activity and servicing personnel office
- Telephone audit with the appellant
- Telephone interview with appellant's supervisor
- Telephone interview with activity classifier

Position Information

The appellant is the Safety and Occupational Health Manager for the Naval Support Activity, which houses approximately 50 tenant activities, including the Headquarters, Naval Reserve Force. The

appellant is responsible for planning, evaluating and overseeing the safety and occupational health program for the installation, which consists of more than 100 buildings and facilities (office buildings, residential, semi-industrial). Most of the operations at the Naval Support Activity are administrative in nature. However, there are some light industrial operations at the base, including warehousing and supply, public works, construction, and waterfront operations.

As the safety manager, the appellant ensures that the installation complies with all applicable safety and occupational health regulations, directives, and instructions set by the Department of Navy and the Occupational Safety and Health Administration (OSHA). As such, the appellant directs or conducts safety inspections of all of the tenant activities and operations; oversees the fire inspection program; designs and conducts a variety of safety and occupational health related training sessions; investigates, analyzes, and evaluates accidents and mishaps, looking for ways to improve safety; and develops and recommends safety and occupational health policies and procedures for the installation. The appellant supervises the employees assigned to the Safety Office, including a safety and occupational health specialist, an office automation clerk, and two fire inspectors (primarily administrative supervision). The supervisory duties account for about 15% of the duty time. The appellant reports to the Executive Officer of the Naval Support Activity (a Navy Commander). Both the appellant and his supervisor have certified the accuracy of the position description.

Standard(s) Referenced

- OPM Position Classification Standard for Safety and Occupational Health Management Series, GS-018, TS-55, August 1981
- OPM General Schedule Supervisory Guide, TS-123, April 1993

Series and Title Determination

The appellant's position is properly allocated to the GS-018 series, which covers positions involved in the management, administration, or operation of a safety and occupational health program. The standard for the GS-018 series authorizes the title "Safety and Occupational Health Manager" for positions responsible for planning, organizing, directing, operating and evaluating a safety and occupational health program for an agency or subordinate level, such as a bureau, command, regional or district office or installation. In this case, the appellant is responsible for the overall direction of the Naval Support Activity's safety and occupational health program, and is appropriately titled Safety and Occupational Health Manager, GS-018.

Grade Determination

The appellant has partially based his appeal on the contention that he should be classified at least one grade above his subordinate safety specialist, who is currently classified as a GS-11. Because the supervisory duties performed by the appellant do not constitute at least 25% of the duty time, the position cannot be evaluated using the General Schedule Supervisory Guide. Therefore, the grade levels of the appellant's subordinates are not considered in the evaluation process.

The grade level criteria found in the GS-018 standard will be used to determine the grade of the appellant's position. The standard uses the Factor Evaluation System (FES) format to determine the grade.

In his appeal submission, the appellant cited an unsigned position evaluation statement prepared by the command using the GS-018 standard which resulted in a grade GS-12. According to the command classifier, this evaluation was prepared to show what factor levels were necessary to elevate the grade from the GS-11 to GS-12, and is not an official evaluation. The appellant contends that this evaluation is applicable to his position, and has submitted it as the technical rationale for his appeal. The appellant disagrees with the activity's official evaluation in the factor level assignments under Factor 2, Supervisory Controls; Factor 4, Complexity; and Factor 6, Personal Contacts. This evaluation will focus on those factors in contention.

Factor 1. Knowledge Required

The activity has assigned level 1-7 for this factor, and the appellant does not disagree. Concur with the activity. Level 1-7 is assigned. 1250 points

Factor 2. Supervisory Controls

The activity has credited level 2-4 for this factor. The appellant believes that level 2-5 is the correct level.

This factor measures the nature and extent of direct or indirect controls exercised by the supervisor, in terms of the responsibility of the employee to carry out the assignments and the extent of review of completed work. At level 2-4, the supervisor sets the overall safety and occupational health objectives and management resources available to achieve the expected results, and the employee is responsible for independently planning and carrying out a safety program or a significant assignment and resolving most conflicts and hazardous situations. At this level, the supervisor is kept informed of progress, potentially controversial safety matters, or far-reaching implications; and completed work is reviewed only from an overall standpoint in terms of compatibility with other activities, or effectiveness in meeting safety objectives. This level is typical of most safety and occupational health managers who direct an operating safety program, in which they exercise a high degree of independence under little direct supervision or technical guidance. The appellant's position clearly meets level 2-4. At level 2-5, the supervisor provides administrative direction only, and makes assignments in terms of a broadly defined safety and occupational health mission or functional goals. Safety managers, at this level, independently plan, design, and carry out safety programs under applicable laws, providing technical leadership to other safety managers. Work results are usually considered authoritative, and are accepted without significant change. At this level, the work is reviewed (if at all) for fulfillment of overall program objectives, or contribution to the advancement of safety and occupational health management. This level assumes a level of responsibility significantly greater than the direction and operation of a single safety program (at an installation), and is normally found in positions with agency-wide technical responsibility for safety and occupational health programs. Although the appellant is given wide latitude to direct the installation's safety program with

little on-site technical supervision or oversight, his position does not involve the degree of responsibility and freedom from supervision that is required for crediting 2-5. Level 2-4 is the correct level for the appellant's position. 450 points

Factor 3. Guidelines

The activity has credited 3-3 for this factor, and the appellant does not disagree. Concur with activity. Level 3-3 is assigned. 275 points

Factor 4. Complexity

The activity credited 4-3 for this factor. The appellant believes that level 4-4 is the correct level.

At level 4-3, assignments involve a variety of duties requiring the application of different safety and occupational health methods, techniques, and procedures to conventional problems, as would be encountered at organizations with stable work processes and small storage facilities where hazardous materials are placed. Work at this level requires the identification and assessment of elements contributing to potential safety hazards or dangerous working conditions; established methods, practices and procedures are adequate (with minor changes) for controlling or eliminating potential or existing hazards. The appellant's work assignments easily meet and exceed this level of complexity. As the installation safety manager, the appellant is responsible for the entire safety and occupational health program, which involves a greater variety of problems (conventional and unconventional), requiring a broader application of methods, techniques and practices in not only identifying and assessing potential and existing safety hazards, but also analyzing, evaluating, and improving conditions at the installation. This program responsibility, coupled with the diversity of the potential and existing safety hazards, is characteristic of the complexity of assignments described at level 4-4. The standard illustrates this level in Benchmark Description 11-5, which describes a position that serves as safety and occupational health manager at a military installation with responsibility for the overall direction of a comprehensive safety program. Under Factor 4, Complexity, this benchmark (11-5) describes the safety manager as having responsibility to plan, organize, direct and evaluate a fully developed safety and occupational health program requiring the development of local regulations and guidance; the identification, evaluation, and control of hazardous operations and conditions; and the promotion and fostering of safety education activities and systematic analysis of mishaps. This description (credited at level 4-4) is comparable to the appellant's responsibilities, and provides additional justification for assigning level 4-4. Level 4-4 is the appropriate level for this factor. 225 points

Factor 5. Scope and Effect

The activity assigned level 5-3 for this factor, and the appellant does not disagree. Concur with activity. Level 5-3 is credited. 150 points

Factor 6. Personal Contacts

The activity assigned level 6-2 for this factor. The appellant believes that level 6-3 is the correct level.

This factor measures the level of personal contacts the employee is required to have in order to successfully perform the primary duties of the position. At level 6-2, contacts are with employees in the same agency, but outside the immediate organization, such as line supervisors, safety specialists, safety engineers, industrial hygienists, medical officers, etc., and are generally routine and within a structured setting. The appellant's position clearly meets (and exceeds) this level of personal contacts. At level 6-3, contacts are often of a non-routine nature, with a variety of individuals from within and outside the organization, such as managers, judges, representatives from privately owned businesses, state and local government officials, and representatives from national safety associations. As the installation safety manager, the appellant is required to have regular contacts comparable to those described in level 6-3. He represents the command for all issues related to safety and occupational health, not only to the tenants located within the Naval Support Activity, but also with outside entities (OSHA, local/state government, private contractors, etc.). These contacts are also comparable to the benchmark description in the standard for GS-11 (BMK GS-11, #5), which awards level 6-3 based on the safety manager's contacts with military and civilian managers, medical, procurement, and personnel specialists, contractor representatives, officials of regional and municipal safety councils, other safety specialists and managers, and employees. The appellant's position meets level 6-3 for this factor. 60 points

Factor 7. Purpose of Contacts

The activity credited level 7-3 for this factor, and the appellant does not disagree. Concur with activity. Level 7-3 is credited. 120 points

Factor 8. Physical Demands

The activity assigned level 8-2 for this factor, and the appellant does not disagree. Concur with activity. Level 8-2 is credited. 20 points

Factor 9. Work Environment

The activity assigned level 9-2 for this factor, and the appellant does not disagree. The correct level, however, is 9-1. This factor measures the regular and recurring risks and discomforts found in the employee's work surroundings. At level 9-1, work is usually performed in an office setting, with occasional exposure to the risks and hazards requiring special safety precautions and clothing. The appellant's position clearly meets this level. At level 9-2, work involves regular and recurring exposure to hazards, unpleasantness, and discomforts such as moving machine parts, shielded radiation sources, irritant chemicals, acid fumes, physical stresses, high noise levels, adverse weather conditions, and high temperature from steam lines. At this level, generally found in industrial settings, protective equipment is often required in carrying out the duties. Although the appellant is exposed to risks and hazards comparable to those described at level 9-2, this exposure is occasional rather than regular and recurring. Most of the inspections conducted by the appellant occur in office buildings, where risks are limited. Level 9-2 may only be assigned when exposure to such conditions is frequent; this level is not fully met by the appellant's position. Level 9-1 is credited. 5 points

SUMMARY OF FACTOR LEVELS

The factor level and points summary based on the application of the GS-018 criteria is as follows:

Factor Level Summary

Factor Level	Points
1-7	1250
2-4	450
3-3	275
4-4	225
5-3	150
6-3	60
7-3	120
8-2	20
9-1	5
Total	2555

Point Ranges

2355-2750	GS-11
2755-3150	GS-12

The appellant's position falls within the GS-11 range, based on the grade conversion chart in the GS-018 standard.

Decision

The appellant's position is properly classified as Safety and Occupational Health Manager, GS-018-11.