

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

DoD Decision:	Safety and Occupational Health Specialist, GS-0018-11
Initial classification:	Safety and Occupational Health Specialist, GS-0018-11
Organization:	Navy Aviation Depot Command Support Office Occupational Safety and Health Office
Date:	September 09, 1996

Position Information

The appellant occupies a position as a Safety and Occupational Health Specialist, GS-018-11 located in the Occupational Safety and Health (OSH) Office, Command Support Office, Naval Aviation Depot. The appellant is seeking to have the position classified at the GS-12 level.

In brief, the appellant plans, conducts, and documents OSH inspections of assigned shops and serves as the program manager or assistant program manager for a variety of specific safety programs such as Radiation Safety, Aviation Gas Free Engineering, Confined Space, Energy Control (Lockout/Tagout), Laser Systems, Respiratory, and Emergency Medical Technician. He provides advice and assistance to personnel on program matters, ensures regulations are adhered to, conducts training, and ensures personnel are qualified to work within hazardous areas. The appellant works under the general direction of the Safety and Occupational Health Manager. The staff consists of 6 Safety and Occupational Health Specialists, 2 Industrial Hygienists, and a Safety Engineer. The appellant is the only employee assigned to the appealed position description.

Sources of Information

This decision is based on the following information:

1. The written appeal request and agency administrative report.
2. A telephone audit with the appellant.
3. A telephone interview with the appellant's supervisor.

Series and Title Determination

The appellant does not dispute title or series of his position, but notes that responsibility for protecting personnel from ionizing radiation is included in the GS-1306 Health Physics Series and also discussed in the GS-690 Industrial Hygiene Series. Some overlap occurs between these occupations, but positions that involve primarily the application of knowledge of the principles, standards, and techniques of safety in the workplace, as does the appealed position, are classified in the Safety and Occupational Health Management Series. Therefore, the correct title and series for the appealed position are Safety and Occupational Health Specialist, GS-018.

Grade Level Determination

The position classification standard for the GS-018 Series, dated August 1981, is used to determine the proper grade level for the position. The standard is in Factor Evaluation System (FES) format which uses nine factors to determine the grade level of the position. Because the classification decision is central to the whole personnel process, it is important to understand how FES standards must be applied to determine the proper grade level. Each FES occupational standard describes the factor levels applicable to that type of work. A position factor must meet the full intent of a factor level to be credited with that level. If the position exceeds one factor level but fails to meet fully the intent of the next higher factor level, then the lower factor value must be credited. Position factors that exceed or fall short of the described factor levels are compared to the Primary Standard, which serves as the framework for each occupational FES standard.

Factor 1, Knowledge Required by the Position

This factor measures the nature and extent of the knowledge and skills needed and how they are used in doing the work. The activity assigned Level 1-7 for this factor. The appellant believes Level 1-8 should be assigned because of the importance of the programs he manages and his responsibility for them. Illustrative of the expert knowledge demonstrated at Level 1-8 is the requirement to recommend far-reaching, substantive program changes or alternative new courses of managerial action which require the extension and modification of existing management techniques critical to problem resolution. Examples of work at this level include management of a ballistic research laboratory safety program, identification of high safety risks to military flight and supporting ground systems of a major military command, serving as a service safety and occupational health manager in a worldwide setting for military explosives and hazardous materials, managing the safety and occupational health program of a major industrial operation, or developing and recommending new programs at the agency level for highly hazardous health research activities. The knowledge required to manage the programs under the appellant's responsibility at the Depot is not equivalent to the criteria at Level 1-8.

Rather, typical of Level 1-7, the appellant's position requires knowledge applicable in identifying, evaluating, and controlling a wide variety of industrial hazards related to the full range of work operations. The programs managed have diverse but recognized hazards, and the employee must achieve compliance with regulatory provisions and effectively communicate multiple safety and occupational health practices and procedures to staff and line personnel. The employee must modify or significantly depart from standard techniques in devising specialized operating practices to accomplish program objectives. For example, the appellant designed a safety booth for magnesium thorium work and directed the reworking of a door on an x-ray vault

to comply with standards. A radiation program, to be evaluated at Level 1-8 under the GS-690 standard, would have to be experimental work involving a wide variety of radiological agents in undeveloped or critical stages. The radiation hazards at the Depot, e.g., non-destructive testing, are not experimental and do not meet the Level 1-8 criteria.

Classroom instruction responsibilities at Level 1-7, also similar to the appellant's training duties, include preparing formal training materials and communicating standard safety and occupational health techniques and steps to participants. The appellant's position does not meet the criteria at Level 1-8; therefore, Level 1-7, 1250 points, is assigned.

Factor 2, Supervisory Controls

This factor evaluates how the work is assigned and reviewed and the employee's responsibility for carrying out the work. The activity assigned Level 2-4 for this factor. The appellant believes Level 2-5 should be assigned because of the independence with which he carries out program requirements. At Level 2-4, the employee typically has responsibility for independently planning and carrying out a safety and occupational health program or a significant assignment and resolving most conflicts and hazardous situations. The supervisor sets the overall safety and occupational health objectives and management resources available to achieve the expected results. Program or specialized requirements and time constraints typically are developed in consultation with the supervisor. The appellant's responsibility is comparable to this level. He manages his program areas on a day to day basis within the priorities and goals established by his supervisor or higher level program instructions. The supervisor manages the budget and determines the management resources available.

Level 2-5 reflects administrative supervision only, with full technical authority delegated to the employee. The appellant's position falls short of this level of authority. When considering Level 2-5, the availability of a technically qualified supervisor must be considered. The existence of such a position in the management chain, while not in itself conclusive, makes Level 2-5 highly unlikely. When such a position exists, the supervisor generally exercises substantial program control, such as analyzing policies from higher authority and determining their effect on the program; formulating and issuing policy statements governing the program; establishing procedures to provide for management needs and ensure efficient operations; exercising normal supervisory control, including planning and assigning work, setting priorities, and giving program guidance. Such factors must be carefully analyzed in evaluating supervisory controls. Neither the absence of immediate supervision in day-to-day operations, nor the fact that technical recommendations are normally accepted, serves to support a level above 2-4. The appellant's supervisor exercises comparable authority and thus the appellant's position does not support Level 2-5. Level 2-4, 450 points, is assigned.

Factor 3, Guidelines

This factor evaluates how the work is assigned and reviewed and the employee's responsibility for carrying out the work. The activity assigned Factor Level 3-3. The appellant believes Factor Level 3-5 should be assigned because of the extensive interpretation and ingenuity required to manage the Confined Space Program and classify x-ray vaults. The employee at Level 3-5, develops nationwide standards, procedures and instructions, working from basic legislation, agency policies and mission statements requiring extensive interpretation and ingenuity for adaptation. The appellant is not charged with developing Department of the

Navy standards. Rather, he follows NAVAIR and NAVOSH instructions, as well as OSHA and Nuclear Regulatory Commission (NRC) guidelines. The appellant's position also fails to meet Level 3-4, where guidelines are insufficient to resolve highly complex or unusual work problems such as determining the potential hazard of detonating various experimental explosive devices in a research and development environment. The appellant does not work in an experimental environment and works with specific guidelines, typical of Level 3-3, such as OSHA and agency manuals, that require independent interpretation, evaluation, selection and modifications and adaptations when necessary. Level 3-3, 275 points, is assigned.

Factor 4, Complexity

This factor covers the nature, number, variety, and intricacy of tasks, steps, processes, or methods in the work: the difficulty in identifying what needs to be done; and the difficulty and originality involved in performing the work. The activity assigned Level 4-4 for this factor. The appellant believes Level 4-5 should be assigned because of constantly changing, high safety risk hazards in the confined space and aviation gas free areas and serious conflicts between operational requirements and the safety requirements that affect the timeliness of mission accomplishment. Work at Level 4-5 requires the development of new prevention techniques to eliminate or control dangerous physical conditions. The information supplied by the appellant during the audit indicates the hazards associated with these and the other programs for which he is responsible require the adaptation of known control or protective measures to eliminate or minimize hazardous situations, e.g., use of respirators and special ventilation systems, setting up barriers and maintaining safety distances, wearing protective equipment and clothing, using shielded booths and vaults, etc. This is typical of Level 4-4 where the nature of the hazards is such that generally no single approach is adequate to control or eliminate a given problem; rather, the adaptation of proven safety and occupational health techniques is necessary. Level 4-4, 225 points, is assigned.

Factor 5, Scope and Effect

This factor covers the relationship between the purpose, breadth, and depth of the assignment and the effect of the work products or services both within and outside the organization. The activity assigned Level 5-3 for this factor. The appellant believes Level 5-5 should be assigned as his work affects personnel within and outside the facility. Our audit revealed that the primary purpose of the appellant's work is to reduce or eliminate the potential for injury to Depot employees. He is not charged with developing new guides for and providing expert advice to other safety specialists and managers throughout the Navy and other agencies characteristic of Level 5-5. Neither is he principally responsible for the development of safety and occupational health criteria and procedures for major Navy activities. Typical of Level 5-3, his work affects the physical safety and occupational health of Depot employees and the general public. Level 5-3, 150 points, is assigned.

Factor 6, Personal Contacts

Factor 6 includes face-to-face contacts and telephone and radio dialogue with persons not in the supervisory chain. The personal contacts that serve as the basis for the level selected under Factor 6 are to be used for selecting a level under Factor 7. The appellant does not believe the agency assignment of Level 6-3 is sufficient for his position. Although the appellant indicates he has provided written correspondence to elected representatives, his regular and recurring contacts are not with key public and corporate executives, elected

representatives, and top scientific personnel of other departments and agencies, State, county, and municipal governments, private industry, national safety and health organizations, public groups, and national research organizations, nor does he participate as a technical expert on committees and seminars of national and international stature characteristic of Level 6-4. Level 6-3, 60 points, is therefore assigned.

Factor 7, Purpose of Contacts

The appellant does not dispute the activity credit of Level 7-3 for this factor, where the purpose of the contacts is to influence, motivate and encourage unwilling, skeptical and often uncooperative individuals to adopt or comply with safety and occupational health standards, practices, procedures or contractual agreements. Level 7-3, 120 points, is assigned.

Factor 8, Physical Demands

This factor covers the frequency and intensity of the physical agility and dexterity required by the work assignment. The appellant does not dispute the activity assignment of Level 8-2, which requires regular and recurring physical exertion related to frequent inspections and surveys requiring considerable standing, walking, climbing, bending, crouching, stretching, reaching or similar movements. Level 8-2, 20 points, is assigned.

Factor 9, Work Environment

This factor considers the risks and discomforts in the employee's physical surroundings and the safety precautions required. The appellant does not dispute the activity credit of Level 9-2, which involves regular and recurrent 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 temperatures from steam lines. Level 9-2, 20 points, is assigned.

In summary, we have assigned the following levels and points to the position:

<u>FACTOR</u>	<u>LEVEL</u>	<u>POINTS</u>
KNOWLEDGE REQUIRED	1-7	1250
SUPERVISION	2-4	450
GUIDELINES	3-3	275
COMPLEXITY	4-4	225
SCOPE AND EFFECT	5-3	150
PERSONAL CONTACTS	6-3	60
PURPOSE OF CONTACTS	7-3	120
PHYSICAL DEMANDS	8-2	20
WORK ENVIRONMENT	9-2	20
TOTAL		2570

The total points assigned for the position, 2570, fall within the GS-11 point range of 2355-2750.

Decision

This position is properly classified as Safety and Occupational Health Specialist, GS-018-11. This decision constitutes a classification certificate that is binding on all administrative, certifying, payroll, disbursing, and accounting offices within the Department of Defense.