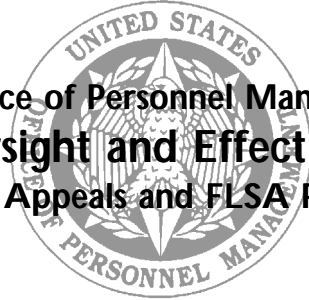


U.S. Office of Personnel Management
Office of Merit Systems Oversight and Effectiveness
Classification Appeals and FLSA Programs



Washington Oversight Division
1900 E Street, N.W.
Washington, D.C. 20415

Classification Appeal Decision
Under Section 5103 of Title 5, United States Code

Appellant: [names]

Agency classification: Aircraft Work Inspector
WG-8852-11

Organization: [section]
[logistics group]
Air Force Reserve Command
U.S. Air Force
Department of Defense
[Air Force base and State]

OPM decision: Federal Wage System
(Pay system determination only)

OPM decision no. : C-8852-00-01

Richard Quasney
Classification Appeals Officer

May 17, 1999
Date

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a classification 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 the conditions and time limits specified in title 5, Code of Federal Regulations, sections 511.605, 511.613, and 511.614, as cited 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 23, 1998, the Washington Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from [appellants], who are employed as Aircraft Work Inspectors, WG-8852-11, in the [section] of the [logistics group], Air Force Reserve Command, at [Air Force base and State]. The appellants requested that their job be reclassified to the General Schedule as Quality Assurance Specialist (Aircraft), GS-1910-10/11. This appeal was accepted and decided under the provisions of section 5103 of title 5, United States Code.

The appellants had previously appealed their pay system classification to the Department of Defense, but that appeal was denied and the current classification to the Federal Wage System sustained on November 24, 1998.

An on-site job audit was conducted by a Washington Oversight Division representative on April 5, 1999. This appeal was decided by considering the audit findings and all information of record furnished by the appellants and their agency, including their official job description, Air Force Core Personnel Document Number 73090, classified by the servicing personnel office as Aircraft Work Inspector, WG-8852-11, on June 20, 1997, and the appellants' written submission of additions and modifications to that document.

Job Information

The job description states that the primary purpose of the appellants' job is "to observe and determine quality of in-process and after-the-fact maintenance; ensure prescribed technical and management procedures are followed and quality maintenance is achieved; manage the organization's product improvement, weight and balance, functional check flight, and technical order distribution programs; and train reservists in the tasks of this position." This is an accurate summary of the main duties performed by the appellants. The desk audit confirmed that the appellants perform the following duties further described in the job description, and that these duties constitute the major portion of the appellants' time:

- Evaluating assigned personnel performance, documentation, and observable maintenance processes to ensure compliance with technical and procedural directives, and performing inspections on a sample basis. This includes observing maintenance and repair work carried out by aircraft mechanics in progress to ensure conformance to prescribed technical procedures; physically or visually inspecting parts and components for defects, serviceability, and proper installation; and completing periodic evaluations of maintenance personnel to document their knowledge of the aircraft systems and associated maintenance requirements and procedures, and informing the respective supervisors of corrective actions or additional training needed.

- Serving as technical advisor and assistant to the production work center manager in the resolution of quality problems and maintaining unit product improvement programs. This includes consulting engineers at the Air Logistics Centers (ALC's) on the resolution of parts or equipment problems (e.g., whether a part can be modified to substitute for another part that is no longer

available); preparing quality deficiency report (QDR) submissions documenting equipment or system defects/operational problems and inputting these reports to an on-line database; investigating the causes of equipment failures, sending this equipment to the ALC's for repair, and reporting on recurring problems; evaluating and recommending action on unit suggestions and equipment modification proposals; and performing one-time inspections on assigned aircraft as directed.

- Interpreting technical orders, blueprints, aircraft schematics, instructions, and messages regarding aircraft maintenance methods and procedural guidance. This includes reviewing technical orders and other instructions for applicability to the assigned equipment; ensuring that prescribed actions are completed within specified time frames; and maintaining the master technical order library for the Logistics Group.

The remainder of the appellants' time is spent on other, miscellaneous functions such as performing weight and balance computations, maintaining associated weight and balance records, and periodically weighing assigned aircraft; performing occasional functional check flight inspections for maintenance; and providing training to reservists assigned to the unit, as described in the appellants' job description. The appellants also provided a list of other duties performed that are not included in the job description. However, these duties are either very infrequent or are related to the other major duties described above. In the category of infrequent duties are: conducting accident/mishap investigations for the unit; reporting incidents of dropped objects from aircraft; and investigating and reporting foreign object damage to aircraft. Duties that are actually aspects of other major duties described above include: impounding aircraft with major operational problems; requesting waivers for temporary use of defective parts; ensuring that tools used are of acceptable quality; determining whether supervisors are taking corrective actions based on personnel evaluations; making recommendations to replace or modify items with a high failure rate; developing local operating instructions for maintenance work; and requesting authorization to repair parts in-house when replacement parts are not available. The appellants are also responsible for monitoring, inspecting, and evaluating the work of repair contractors performing on-site work, but this is likewise a relatively infrequent requirement (i.e., about 4-6 times yearly).

Although the appellants contend that they are performing duties and responsibilities "well outside" their official job description, the desk audit verified that the job description represents a basically accurate portrayal of the main duties being performed by the appellants. During the audit, it was confirmed that all of the duties listed in the job description are indeed being performed, although the appellants take exception to the manner in which some of the duties are arranged and the degree of detail presented. As discussed above, they also provided information related to other duties performed that are not listed in the job description. However, these are either relatively minor or infrequent duties that constitute a small portion of the appellants' time and thus would not normally be included in a job description; duties that represent requirements associated with other major duties (e.g., impounding aircraft, requesting authorizations and waivers); or duties that are ancillary to the primary work performed (e.g., using personal computers and databases to input data or submit reports). Other objections to the job description expressed by the

appellants relate to issues of semantics, most of which have no effect on the actual classification of the job. We did find that the job description's reference to the appellants "managing" various aspects of the quality assurance program to be misleading, as the appellants carry out the work associated with the program but are not ultimately responsible for its successful accomplishment as the term "manage" would imply. Likewise, the appellants' assertion that they "develop" any aspects of the program was not confirmed by the desk audit. The design of forms for local use does not constitute program development in the sense of determining the overall functions that should be performed and how the work will be accomplished.

This evaluation is based on an assessment of the duties and responsibilities actually being performed by the appellants as presented in the desk audit and in the supporting materials submitted with the classification appeal. Although these duties and responsibilities are basically expressed in the job description, this evaluation is not solely dependent on that document.

Pay System Determination

Guidance on determining pay system coverage (General Schedule versus Federal Wage System) is contained in Section IV of the Introduction to the Position Classification Standards, dated August 1991. This guidance states that the decision as to whether particular types of positions are trades, crafts, or manual labor occupations excluded from coverage under the General Schedule depends primarily on the paramount knowledges, skills, and abilities needed to perform the primary duty or responsibility for which the position has been established. If a position clearly requires trades, crafts, or laboring experience and knowledge as a requirement for performance of its primary duty, and this requirement is paramount, the position is under the Federal Wage System. Conversely, a position is subject to the General Schedule, even if it requires physical work, if its primary duty requires knowledge or experience of an administrative, clerical, scientific, artistic, or technical nature not related to trade, craft, or manual labor work.

The FWS Job Grading Standard for Aircraft Mechanic, 8852, covers jobs involved in the maintenance, troubleshooting, repair, overhaul, and modification of aircraft systems, airframes, components and assemblies, where the work requires substantive knowledge of the airframe and aircraft mechanical, pneudralic, and/or electrical systems and their interrelationships. This basically expresses the primary knowledge requirements of the appellants' job. The major and most critical duties performed by the appellants require comprehensive knowledge of the assigned aircraft systems, and the ability to use this knowledge in interpreting technical orders and other instructions to determine maintenance actions required; evaluating work carried out by aircraft mechanics for compliance, adequacy of repairs, and proper installation of parts; and conducting physical inspections of aircraft systems. These are clearly trade as opposed to administrative knowledges.

The Quality Assurance Series, GS-1910, dated March 1993, includes positions the duties of which are to perform, administer, or advise on work concerned with assuring the quality of products acquired and used by the Federal Government. The work of this series involves: (1) the

development of plans and programs for achieving and maintaining product quality throughout the item's life cycle; (2) monitoring operations to prevent the production of defects and to verify adherence to quality plans and requirements; and (3) analysis and investigation of adverse quality trends or conditions and initiation of corrective action. The duties of positions in the GS-1910 series require analytical ability combined with knowledge and application of quality assurance principles and techniques, and knowledge of pertinent product characteristics and the associated manufacturing processes and techniques.

The GS-1910 standard provides further guidance on the distinction between quality assurance work under the General Schedule and inspection work under the Federal Wage System. It specifies that quality assurance specialists use a variety of administrative, analytical, and technical methods and techniques to ensure the quality and reliability of products. Inspection, by physical test or measurement of the product, is only one of the techniques applied by quality assurance specialists. In the context of quality assurance work, tests and measurements at various points in the production cycle: provide objective evidence as to the effectiveness of quality procedures and controls; identify potential problem areas or inherent weaknesses in the product itself, the technical data, materials, or manufacturing processes; and serve as a basis for adjusting surveillance or control over operations. For maintenance and manufacturing quality assurance, the standard lists such major quality functions as:

- Participating with production, engineering, and other activities in developing plans and procedures for assuring quality and reliability of products;
- Reviewing work instructions and technical data to identify characteristics critical to product acceptability, and providing inspection and test procedures;
- Monitoring quality of materials and supplies required to support production activities;
- Conducting audits of products and processes for conformance to specifications and to detect processing and technical documentation deficiencies and recommending corrective action, including establishment of acceptable quality levels and statistical techniques;
- Verifying product quality using sampling inspection or more intensive product inspection techniques;
- Investigating customer complaints and deficiency reports and providing identification of causes to appropriate activities;
- Monitoring programs for controlling the accuracy of test and measuring equipment;
- Evaluating procedures for maintaining control of drawings and technical data;
- Coordinating the disposition of nonconforming material; and

- Analyzing quality data to detect unsatisfactory trends or conditions and weaknesses in the quality system.

For inspection positions, test and measurement of the product serve a far narrower purpose, in that they provide the basis for accepting or rejecting the product, service, or process involved and determining the condition of supplies, equipment, or material as serviceable, repairable, or condemned. The inspector is primarily concerned with determining conformance of the product to drawings and/or technical specifications, reporting defects encountered and their probable causes.

The appellants' job does not fall within the coverage for the GS-1910 series. Our review of their major duties did not confirm their contention that the primary purpose of their job is "to administer various quality assurance programs designed to monitor and maintain the safety, reliability, and quality of assigned aircraft and its support system throughout its life cycle." The appellants work within the context of a local operation responsible for the maintenance of the nine C-141 aircraft stationed at [Air Force base]. There are ten other locations around the country that also provide maintenance services for the C-141's stationed at their respective bases. The overall managing activity for the C-141 is Warner-Robins AFB, Georgia, which establishes the maintenance plans, procedures, and schedules and the technical data pertaining to product acceptability and performance requirements. The appellants' responsibilities are much narrower in scope, i.e., ensuring the safety and technical order compliance for these nine individual aircraft. Although they consult ALC engineers to discuss particular maintenance problems, they do not work in conjunction with them to develop quality plans and procedures, nor do they review technical data for new equipment or components to devise the inspection and test procedures, since these are prescribed by the various engineering activities. In this way, they are not involved in "the development of plans and programs for achieving and maintaining product quality throughout the item's life cycle." Although they are involved in "monitoring operations to prevent the production of defects and to verify adherence to quality plans and requirements," this monitoring is performed exclusively by observing maintenance work in progress and conducting hands-on inspections rather than through more sophisticated methodology such as sampling techniques, statistical analysis, or more intensive inspection techniques. Lastly, they do not have responsibility for "analysis and investigation of adverse trends or conditions and initiation of corrective action." They are required to report deficiencies identified or encountered within the course of their work to the ALC engineering activities by means of the Quality Deficiency Report. However, this being a local operation, they are not responsible for identifying and analyzing overall trends related to maintenance of the C-141, nor for initiating corrective action to reduce the incidence of problems or deficiencies beyond the repair of their immediate aircraft. Thus, the basic requirements of the GS-1910 series are not met.

The primary knowledge requirements of the GS-1910 series are knowledge and application of quality assurance principles and techniques, and knowledge of pertinent product characteristics and the associated manufacturing processes and techniques. The appellants' job does not require these knowledges. The quality assurance principles and techniques referred to in this context

include such methodologies as statistical analysis and sampling techniques, procedures evaluation, process audits, and investigations of defective material. The appellants do not perform any of these techniques. Their involvement in quality assurance relates to ensuring that maintenance work performed on the assigned aircraft is properly carried out and that prescribed technical orders are accomplished expeditiously. Their focus is on the adequacy and acceptability of the maintenance work itself, not on the effectiveness of the overall maintenance process for the C-141. For example, they do not develop and continuously revise maintenance procedures for new equipment and components installed on the aircraft, or investigate trends and recurrent complaints to identify at what point in the maintenance process additional quality safeguards should be instituted. In this way, the knowledge required of product characteristics and the associated manufacturing processes is more limited than that expected within the context of the GS-1910 series, since the appellants are not involved in determining the type or level of maintenance required for this aircraft.

The appellants contend that their jobs should be classified to the General Schedule because they regard most of their work as being administrative in nature. Beyond the particular requirements of the GS-1910 series, administrative work is defined in the Classifier's Handbook (dated August 1991) as "work that requires a high order of analytical ability combined with comprehensive knowledge of (1) the functions, processes, theories, and principles of management and (2) the methods used to gather, analyze, and evaluate information." A position is subject to the General Schedule if its primary duty requires knowledge or experience of an administrative nature not related to trade, craft, or manual labor work. The work regarded by the appellants as "administrative" is actually closely related and ancillary to the primary inspection function. It includes the performance of duties that serve the purposes of: determining what work needs to be done (e.g., reviewing technical orders for applicability and ensuring their distribution to the aircraft mechanics); ensuring that the work is being carried out properly and documenting any deficiencies or deviations (e.g., completing personnel evaluations based on observation of work in progress); resolving problems encountered in the course of the work (e.g., consulting with engineers on equipment problems); and reporting on results of the work. These are not "program administration" duties but rather duties that are directly tied to, and further the accomplishment of, the basic inspection function, with the purpose of ensuring proper maintenance of the assigned aircraft.

Decision

The appellants believe that their job has changed substantially in the past few years. These changes relate primarily to the aging of the aircraft, which necessitates more frequent contacts with the engineering activities on increased maintenance and retrofitting requirements, and the additional requirement for conducting personnel evaluations. However, as addressed above, these duties are extensions of the job's primary inspection function and do not in themselves alter the basic character of the job. As such, the appellants' job is properly assigned to the Federal Wage System.

