U.S. Office of Personnel Management
Office of Merit Systems Oversight and Effectiveness
Classification Appeals and FLSA 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] [appellants' name]
Agency classification:	Supply Technician GS-2005-7
Organization:	Property Inventory and Control Division Asset and Material Management Service VA [name] System Department of Veterans Affairs [locations]
OPM decision:	Supply Technician GS-2005-7
OPM decision number:	C-2005-07-04

/s/ Robert D. Hendler

Robert D. Hendler
Classification Appeals Officer

November 12, 2002

Date

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* (PCS's), appendix 4, section G (address provided in appendix 4, section H).

Decision sent to:

PERSONAL
[appellant's name]
[appellant's address]

PERSONAL
[appellant's name]
[appellant's address]

Director
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Introduction

On July 30, 2002, the Philadelphia Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellants' names]. The appellants occupy two of eight identical additional (IA) Supply Technician, GS-2005-7, positions. The appellants believe the classification should be Inventory Management Specialist, GS-2010-9. OPM received the initial appeal administrative report on July 15, 2002. The positions are in the Property Inventory and Control Division (PICD), Asset and Material Management Service (AMMS), VA [name] System ([acronym]), Department of Veterans Affairs. [appellant's name] is employed at the [location] campus and [appellant's name] at the [location] campus. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

General issues

In a memorandum in the agency appeal package, the appellants stated that they were appealing on behalf of the PICD staff who occupy IA positions. However, their co-workers did not sign the memorandum appointing the appellants as their representatives. A second memorandum signed by the appellants requesting that the appeal be sent to OPM also was not signed by their co-workers. While this appeal decision only applies directly to the appellants' positions, the agency must review and apply the appeal rationale to any identical, similar, or related positions to ensure consistency with this decision as stated on page ii.

The appellants point to the fact that their previous positions were classified to the GS-2010 series from October 1994 until May 1999. They state that their three primary functions are management, coordination, and control of inventory. The appellants point to their position description (PD #[number]) of record which uses the terms "managing" and "analytical" and PICD management's request that their PD be classified as Inventory Management Specialist, GS-2010-9. They questioned the adequacy of their agency's review of their positions.

In an enclosure in the appeal administrative report, the appellants' immediate supervisor said that she believed other VA activities classify similar positions as Inventory Management Specialist, GS-2010-9. OPM is required by law to classify positions on the basis of their duties, responsibilities, and qualification requirements by comparison to the criteria specified in the appropriate PCS or guide (5 U.S.C. 5106, 5107, and 5112). The law does not authorize use of other methods or factors of evaluation, such as comparison to other positions that may or may not have been classified correctly. Because our decision sets aside all previous agency decisions, the appellants' concerns regarding their agency's classification review process are not germane to this decision.

Like OPM, the appellants' agency must classify positions based on comparison to OPM's PCS's and guidelines. Agencies are obligated to review their own classification decisions for identical, similar or related positions to ensure consistency with OPM appeal certificates (5 CFR 511.612). The agency has primary responsibility for ensuring that its positions are classified consistently with OPM appeal decisions. If the appellants consider the appealed position so similar to others that they warrant the same classification, they may pursue this matter by writing to their agency's human resources management headquarters. They should specify the precise organizational location, classification, duties, and responsibilities of the positions in question. If the positions

are found to be basically the same as the appealed position, or warrant similar application of the controlling PCS's, the agency must correct their classification to be consistent with this appeal decision. Otherwise, the agency should explain to the appellants the differences between the appealed position and the others.

Position information

The appellants provide supply support to assigned [acronym] components and/or programs. For example, [appellant's name] supports radiology, pharmacy (non-pharmaceutical items which are not covered by the pharmaceutical Prime Vendor contract), prosthetic device support for the cardiac catheterization laboratory, and the publications and recall program. [appellant's name] supports the domiciliary, the medical/surgical non-pharmaceutical Prime Vendor contract, VA centrally procured Posted Stock, and supplies centrally procured through Veterans Integrated Service Network (VISN) [number].

[acronym] operates through two medical center campuses and eight community-based outpatient clinics. The appellants primarily deal with consumable items and said that approximately 80 percent of the items are supplied through the Prime Vendor contract. However, they must be aware of item overlap since the organizations that they support can use delegated purchasing authority to purchase and stock their own items and move future use to Prime Vendor items. The appellants meet with their customers to support operational changes. They work with doctors and nurses to define supply items needed, determine stock levels, and decide on storage locations. They use the Integrated Funds Distribution-Controlled Point Activity-Accounting and Procurement (IFCAP) and Generic Inventory Packages (GIP) systems to organize and track daily accounting of running balances, distribution, and expenditures. The appellants operate the automated systems to determine whether items are identified and stocked under different stock numbers and/or descriptions since multiple GIP's are used to track inventoried material that is available from the Prime Vendor or other national VA, VISN, or other centralized contracts. The appellants work with the GIP coordinator who notifies staff members when such items are identified so that each person can update their GIP's vendor file.

The appellants ensure that non-inventory items are properly justified and purchased using appropriate methods including open market and sole source. They review trade journals to identify potential disruptions in sources of supply, e.g., recalls of vacuum tubes, solutions, or other high use items that may increase costs. When items are not available, they work with users to determine appropriate substitutions. The appellants forecast and provide for seasonal support changes, e.g., syringes for flu vaccine and diapers to deal with flu-related diarrhea. They review and analyze a wide variety of program reports to track stock turnover, backorder status, items with expiration dates that must be removed from inventory, recalls, and similar program conditions.

The appellants and their supervisor certified the accuracy of the PD of record. Our fact-finding confirmed that the PD of record contains the major duties and responsibilities performed by the appellants and we incorporate it by reference into this decision. However, we find that the PD overstates the scope, difficulty, and complexity of the appellants' work. For example, the PD states that the appellants use vast technical knowledge in forecasting short- and long-range inventory needs under constantly changing technological and program requirements. Long-

range inventory forecasting in the Supply Group, GS-2000, typically pertains to supporting equipment and other complex systems that require extensive provisioning planning and positioning, e.g., based on aircraft engine use and repair patterns and aircraft locations, the inventory management specialist determines the types of consumables and repairable items to be ordered and stored at various sites. These decisions are affected by the level of engine maintenance and repair performed at each site, e.g., flight line or depot level. The appellants are not engaged in this type of supply forecasting. The PD states that the appellants keep abreast of market trends, use a complex system of economic order principles, and manage items based on knowledge of market fluctuations that affect availability. In the GS-2000 Group, complex economic order principles typically refer to analyzing such issues as the cost of production, shelf life, cost effectiveness of repair versus replacement, and other requirements to plan for initial outfitting and periodic replenishment contracts that support complex systems. Market trends and fluctuations provide information on the available manufacturing base and the likelihood of finding competitive manufacturing sources for those items. In contrast, the appellants preponderantly deal with medical and other consumable items available on the open market.

To help decide this appeal, we conducted a telephone audit with the appellants on October 21, 2002, and a telephone interview with their immediate supervisor, [name], Chief, PICD, on October 22, 2002. In deciding this appeal, we fully considered the audit findings and all information of record furnished by the appellants and their agency, including work samples submitted by the appellants at our request.

Series, title, and standard determination

The agency has placed the appellants' position in the Supply Clerical and Technician Series, GS-2005, for which there is a published PCS, and titled it Supply Technician. The appellants believe that their positions are more appropriately classified in the Inventory Management Series, GS-2010, titled Inventory Management Specialist, and evaluated using the Grade-Evaluation Guide for Supply Positions (Guide).

The GS-2005 PCS provides guidance on distinguishing between GS-2005 work and two-grade interval supply specialist work, e.g., GS-2010. The GS-2010 series includes positions that involve analytical work in managing and controlling material. Supply specialists apply knowledge of systems, techniques, and underlying management concepts for determining, regulating, or controlling the level and flow of supplies from initial plan through acquisition, storage, issue, and utilization or disposal. Supply specialists must have a broad understanding of an interrelated chain of activities involving the process of supply, often extending from the conception or acquisition of a new item through storage, distribution, property utilization, consumption, or disposal. They plan and develop the supply system, programs, or services, and develop, adapt, or interpret operating methods or procedures. Supply specialists perform assignments requiring a deeper knowledge and understanding of programs and the needs and operations of the organization serviced. For example, they apply knowledge of present or proposed programs, program changes, work operations, work sequences and schedules and apply knowledge of the technical characteristics or properties of supply items to plan and forecast inventory needs under changing technological or program requirements.

The Guide provides an illustration of GS-2010 hospital work at Level 1-6. In this case, the employee provides supply support for the surgery and inpatient care departments in a hospital, 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). The employee maintains accountability records for nonexpendable materials, traces acquisition sources and methods, resolves problems associated with timely deliveries and lead times, arranges for disposal of surplus and excess property, and monitors the operations and records of store rooms and distribution points, including stock levels, rates of usage, reorder points, and requests for new items. Problems must be resolved 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, supply technicians follow established methods and procedures that have been developed by supply specialists and management personnel. They perform assignments requiring less extensive knowledge of programs, operations, or organizations serviced and requiring a more limited knowledge of system characteristics or technical uses of items of supply or equipment. While some supply technicians perform some of the same work tasks as supply specialists, they do so based on practical experience and familiarity with supply operations, the supply mission of the organization, and supply regulations, policies, procedures, and directives.

The record shows that the appellants perform supply support work necessary to ensure the effective operation of supply activities typical of the GS-2005 series. Their duties require knowledge of supply operations and program requirements and the ability to apply established supply and safety policies, day-to-day servicing techniques, regulations, and procedures to support local supply activities. This does not equate to the in-depth knowledge required of supply specialists in order to plan and forecast inventory needs under changing technological or programmatic requirements. The appellants are not responsible for planning and developing the supply system and do not apply the level of judgment based on the possession of analytical ability and a theoretical or conceptual understanding of supply principles and techniques required by supply specialists. In contrast to the illustration, they deal primarily with commercially available consumable items. The typical goal is to stock no more than a 30-day supply. Broad customer technical requirements typical of GS-2010 work, e.g., program planning for migrating from film to filmless technology, are handled by the appellants' supervisor and higher level positions in AMMS. Those positions provide the life-cycle support for equipment support requiring the application of specialist knowledge and skill, e.g., heart-lung machines. Other positions decide on the types of items to be added to the Prime Vendor contract and/or to VISN [number]-controlled procurement and management. Typical of GS-2005 work, the appellants implement these broad decisions and changes by defining specific item requirements with the customers by arranging for their entry into the system. Consequently, we find that the appellants' positions do not require the extensive knowledge base and do not perform duties that would require the exercise of the level of judgment and analytical ability found in GS-2010 positions.

Because the appellants are not performing two-grade interval supply management work, we may not use the Guide to evaluate their positions. The appellants' positions are properly allocated as Supply Technician, GS-2005, based on the grade determination analysis that follows.

Grade determination

The GS-2005 PCS is written in Factor Evaluation System (FES) format. Positions graded under the FES format are compared to nine factors. Levels are assigned for each factor and the points associated with the assigned levels are totaled and converted to a grade level by application of the Grade Conversion Table contained in the PCS. Under the FES, factor level descriptions mark the lower end; i.e., the floor, of the ranges for the indicated factor level. For a factor to warrant a given point value, it must be fully equivalent to the overall intent of the selected factor level description. If a position fails in any significant aspect to meet a particular level in the PCS, the next lower level and its lower point value must be assigned unless an equally important aspect that meets a higher level balances the deficiency.

Factor 1, Knowledge required by the position

This factor measures the nature and extent of information or facts that the technician must understand to do acceptable work (e.g., steps, procedures, practices, rules, policies, regulations, and principles) and the nature and extent of the skills needed to apply that knowledge.

The appellants' work meets the threshold for Level 1-4 which is the highest level described in the PCS. Work at this level requires a thorough knowledge of governing supply regulations, policies, procedures, and instructions applicable to the specific assignment. The PCS describes two broad types of work functions. The first covers employees who use this knowledge to conduct extensive and exhaustive searches for required information; reconstruct records for complex supply transactions; and/or provide supply operations support for activities involving specialized or unique supplies, equipment, and parts such as special purpose laboratory or test equipment, prototypes of technical equipment, parts and equipment requiring unusual degree of protection in shipment and storage, or others that are unique to the organization's mission and are seldom handled. The second type of work function is performing routine aspects of supply specialist work based on practical knowledge of standard procedures where assignments include individual case problems related to a limited segment of one of the major areas of supply management, e.g., cataloging, inventory management, or storage management.

The appellants occasionally handle specialized equipment, e.g., replacing obsolete blood testing and similar equipment. However, the requesting offices perform the equipment analysis and program planning covered under the first type of work function. The appellants implement those decisions by preparing the required procurement documents and processing the actions. The equipment that they procure is not equivalent to the more complex special equipment handled under this work function. However, we find that the appellants perform the second type of work function typical of Level 1-4. Based on well-established inventory management practices and procedures, the appellants work with assigned organizations on planning for, acquiring, storing and related functions for a broad range of consumable items. Their functions include reviewing justifications for items not carried in the inventory, e.g., pacemakers and defibrillators; reviewing item use to adjust ordering frequency; reviewing potential item substitutions based on user

requests, market availability, or equivalent conditions; meeting with user to determine whether underutilized items are obsolete or excess to the needs of the organization; evaluating whether excess items can be used by other customers; arranging for the transfer of material that can be used by other organizations; conducting inventories of assigned items and/or organizations and identifying and resolving inventory discrepancies; and tracking and resolving issues including delinquent deliveries, backorders, and customer complaints. Typical of the second work function, the appellants carry out program decisions made by managers in the serviced organizations and higher level officials in AMMS by performing routine aspects of inventory management work for a wide range of commercially available items; i.e., planning for and implementing new stock support functions agreed to by higher level officials. Therefore, this factor is credited Level 1-4 (550 points).

Factor 2, Supervisory controls

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

The appellants' work meets but does not exceed Level 2-3 which is the highest level described in the PCS. As at that level, they perform their work with considerable independence from supervision. Receiving general directions and areas of support responsibility, e.g., assigned departments, they independently follow established supply policies, regulations, and instructions. For example, as the Prime Vendor contact point, one appellant deals directly with Prime Vendor representatives to resolve problems. The appellants are responsible for working directly with their assigned customers. The supervisor does not control work flow on a day-to-day basis or review work for the specific methods used to accomplish results. Therefore, Level 2-3 (275 points) is credited.

Factor 3, Guidelines

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

The appellants' work meets but does not exceed Level 3-3 which is the highest level described in the PCS. The guidelines include VA and Federal acquisition and procurement regulations, supply regulations, a variety of directives, VISN and other internal policies and procedures, and automated systems manuals. Although the guidelines are normally applicable to the work performed and to the situations encountered, problems periodically arise as a result of some gap in standard procedures or an unexpected deviation in the system. For example, the appellants work with customers to devise the most efficient and effective way to organize primary and secondary inventory points. Requirements may vary from campus to campus due to variations in how similar programs are organized. As at Level 3-3, the appellants use judgment in interpreting and adapting guidelines such as policies, regulations, precedents, and work directions for application to specific cases or problems, analyze the results of applying guidelines, and recommend changes. For example, new items entered into the Prime Vendor contract require continuous review to establish and adjust usage levels for ordering. Therefore, Level 3-3 is credited (275 points).

Factor 4, Complexity

This factor covers the nature, number, variety, and intricacy of tasks, 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.

The appellants' work meets but does not exceed Level 4-3 which is the highest level described in the PCS. As at that level, they perform a variety of assignments or tasks involving customer support functions. Although available guidelines normally apply to the work and to the situations which they encounter, problems periodically arise as a result of some gap in standard procedures, new or changing situations, and matters for which only general provisions can be made in procedures. For example, the appellants use their knowledge of effective inventory control practices to advise customers on stocking locations, quantities to stock, and reordering frequency. Based on industry information they review, the appellants identify likely shortages, identify and discuss potential replacement items with users, and take action to provide for alternative procurement. They must maintain a high degree of flexibility in coordinating work and issues in light of changing situations relating to customer needs. As at Level 4-3, the appellants analyze each issue and rely on experience and knowledge of precedent actions in many situations to determine the potentially most expedient solution that must consider funding allocations related to acquisition, program changes made by the management officials, and the demands of internal organizations and satellite facilities. Their knowledge and understanding of the interrelationship of supply actions and the interrelated national VA, VISN, and local supply programs are important in reaching a resolution to many problems. Therefore, this factor is credited at Level 4-3 (150 points).

Factor 5, Scope and effect

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 work products or services both within and outside the organization.

As at Level 5-3, which is the highest level described in the PCS, the work involves ensuring the availability of a large number of medical supplies and equipment used in the [acronym]. The appellants conduct inventories to reconcile inventory discrepancies and determine any adjustments needed to accounts. They update the IFCAP and GIP's working with the GIP Coordinator to improve system information and effectiveness by eliminating duplicate items and item numbers. The appellants work with vendors to resolve erroneous charges, quality issues, and similar problems, and ensure that the costs associated with the order in question are corrected. They work with requestors to ensure that special items are properly justified and documented, e.g., pacemakers and defibrillators. When working with users to support changed patient care programs approved by higher level AMMS officials, they modify and change procedures to support defined user needs. The appellants must understand the full range of processes and procedures involved in acquiring, accounting for, and managing both expendable items and non-expendable equipment, as well have a thorough understanding of the agency=s and [acronym]=s goals and objectives as they relate to material and equipment acquisition and management. The work performed by the appellants impacts the well being of patients through

the efficient and timely acquisition of necessary consumables and equipment. Therefore, this factor is credited at Level 5-3 (150 points).

Factors 6 and 7, Personal contacts and Purpose of contacts

Personal contacts include face-to-face contacts and telephone contact with persons not in the supervisory chain. Levels described under this factor are based on what is required to make the initial contact, the difficulty of communicating with those contacted, and the setting in which the contact takes place.

As at Level 2, the appellants' contacts are with employees in the same agency but outside the immediate organization that generally are engaged in different functions, missions, and kinds of work, e.g., health care practitioners and other customers in the [acronym], and supply program employees in the VISN and the VA National Acquisition Center. The appellants' contacts with individuals outside the VA are in a moderately structured setting (e.g., they are usually established on a routine basis at the employee's work place or over the telephone, the exact purpose may be unclear at first, and one or more of the parties may be uninformed concerning the role and authority of other participants). Typical of contacts at this level are employees at approximately the same level of authority in shipping companies, vendor employees concerned with the status of orders or shipments, and others at comparable levels. The appellants routinely have such contacts, e.g., with the Prime Vendor company coordinator and with Government and non-Government vendors to check on product characteristics, availability, cost, and status.

In contrast, Level 3 contacts are with individuals from outside the employing agency in a moderately unstructured setting (e.g., the contacts are not established on a routine basis, the purpose and extent of each contact is different, and the role and authority of each party is identified and developed during the course of the contact). Typical of contacts at this level are supply employees in other departments or agencies, inventory item managers, contractors, or manufacturers. Although the appellants have regular and recurring contact with vendors, contractors, and others, they are not routinely of the nature described in Level 3. In the appellants' situation, the roles and authority are easily clarified based on the nature of the contact itself, e.g., contacting potential vendors for item information and availability. For the appellant who is the principal contact point with the Prime Vendor's contract coordinator, each party's role is well understood.

The appellants' work meets but does not exceed Level b which is the highest level described in the PCS. At this level, the purpose of contacts is to plan, coordinate, or advise on work efforts or to resolve operating problems by clarifying discrepancies in information submitted by serviced organizations, resolving automated system problems causing erroneous transaction records, or seeking cooperation from others to resolve complicated supply actions. The appellants' primary contacts are to coordinate work and resolve problems to ensure the availability of medical supplies and the proper cost accounting for those supplies. They ensure that required supply and inventory management related records and fiscal documents are properly maintained and reflect correct information, coordinate and conduct inventories with the services, ensure that official inventory records are reconciled when discrepancies are found, and coordinate the transfer and/or disposal of excess/surplus stock.

The combined factors are credited at Level 2b (75 points).

Factor 8, Physical demands

This factor covers the requirements and physical demands placed on the employee by the work assignment. This includes physical characteristics and abilities and the physical exertion involved in the work.

The appellants' work meets the threshold for Level 8-2 which is the highest level described in the PCS. At this level, the work requires some physical exertion such as long periods of standing; walking over rough, uneven, or rocky surfaces; recurring bending, crouching, stooping, stretching, reaching; or similar activities. This level of physical demands occurs when employees are regularly assigned to activities such as tracing misplaced items or conducting physical inventories in warehouses, depots, and other storage areas, or when they are regularly involved in stocking and retrieving items from shelves and cabinets. The appellants routinely inventory items in storage areas. This typically involves moving materials that weigh under 25 pounds and rearranging items on shelves. They regularly move material that is delivered at the warehouse in carts, transfer it to the storage site, break the package apart, and stock the shelves. Therefore, this factor is credited at Level 8-2 (20 points).

Factor 9, Work environment

This factor considers the risks and discomforts in the employee's physical surroundings or the nature of the work assigned and the safety regulations required. Although the use of safety precautions can practically eliminate a certain danger or discomfort, such situations typically place additional demands upon the employee in carrying out safety regulations and techniques.

The appellants' work meets Level 9-1 where the employee typically works indoors in an environment involving everyday risks or discomforts which require normal safety precautions, e.g., offices or meeting rooms. The work involves using normal safety practices with office equipment, avoidance of trips and falls, and observance of fire regulations is required. The area is adequately lighted, heated, and ventilated.

In contrast, Level 9-2 work involves moderate risks or discomforts which require special safety precautions, such as working around moving warehouse equipment, carts, or machines. The employee may be required to use protective clothing gear such as masks, gowns, safety shoes, goggles, hearing protection, and gloves. Although the appellants pick up deliveries from the warehouse, they do so wearing normal office attire and do not need to take special safety precautions. Because Level 9-2 is not fully met, this factor is credited at Level 9-1 (5 points).

Summary

In summary we have evaluated the appellants' positions as follows:

Factors	*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. Personal contacts and 7. Purpose of contacts	2b	75
8. Physical demands	8-2	20
9. Work environment	9-1	5
Total Points		1,500

A total of 1,500 points falls within the GS-7 grade level point range of 1,355-1,600 points on the Grade Conversion Table.

Decision

The appellants' positions are properly classified as Supply Technician, GS-2005-7.