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

Chicago Oversight Division
230 S. Dearborn Street, DPN-30-6
Chicago, IL 60604-1687

Classification Appeal Decision
Under section 5112 of title 5, United States Code

Appellant:	[appellant]
Agency classification:	Training Instructor (Unit Conduct of Fire Trainer) GS-1712-9
Organization:	Training Support Center Directorate of Plans, Training & Mobilization Headquarters, [location] Division (Mech) and [location] U.S. Army Garrison Department of the Army [city and state]
OPM decision:	Training Instructor (parenthetical title at option of agency) GS-1712-9
OPM decision number:	C-1712-09-02

/s/

Manuela Martinez
Classification Appeals Officer

October 31, 2002

Date

As provided in section 511.612 of title 5, Code of Federal Regulations, 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).

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Introduction

On July 11, 2002, the Chicago Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal for the position of Training Instructor (Unit Conduct of Fire Trainer), GS-1712-9, located in Training Support Center, Directorate of Plans, Training and Mobilization, Headquarters, [location] Infantry Division (Mech) and [location], U.S. Army [location], Department of the Army, [city and state]. The appellant requests that his position be classified as Training Specialist/Contracting Officer's Technical Oversight Representative, GS-712-11. We received the complete administrative report from the agency on August 2, 2002. We have accepted and decided his appeal under section 5112 of title 5, United States Code (U.S.C).

A representative of the Chicago Oversight Division conducted a telephone audit with the appellant and a telephone interview with his immediate supervisor. In deciding this appeal, we fully considered the audit, the interview findings, and all information of record provided by the appellant and his agency, including his current work assignments and position description (PD) of record.

General issues

The appellant states that his official PD, number [number], is not accurate because it does not reflect what he categorizes as significant changes in technology. He points to his new responsibilities for the Close Combat Tactical Trainer (CCTT), which is a virtual reality trainer. However, his supervisor certified that the appellant's PD is current and accurate.

The appellant provided a draft PD of his work, which he evaluated at the GS-11 level. The appellant makes various statements about his agency's actions, or inactions, regarding his attempts to have his position upgraded and the accuracy of his PD. A PD is the official record of the major duties and responsibilities assigned to a position by an official with the authority to assign the work. A position is the culmination of the duties and responsibilities that make up the work performed by an employee. Position classification appeal regulations permit OPM to investigate or audit a position and decide an appeal on the basis of the actual duties and responsibilities assigned by management and performed by the employee. An OPM appeal decision grades a real operating position and not simply the PD. Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's current PD to others as a basis for deciding his appeal. Therefore, this decision is based on the actual work assigned to and performed by the appellant.

In adjudicating this appeal, our only concern is to make an independent decision on the proper classification of the position. This appeal decision is based on a careful review of all of the information submitted by the appellant and his agency. By law, we must classify positions solely by comparing their current duties and responsibilities to OPM standards and guides (5 U.S.C. 5106, 5107, and 5112). Therefore, we have considered the appellant's statements only insofar as they are relevant to making that comparison.

Position information

The mission of the Training Support Center is to provide advice and assistance to commanders and staffs of Active Army and Reserve Components in [specific states], as well as the enhanced brigades in [specific states], on all matters pertaining to selection and use of audiovisual media (visual information), three dimensional training aids and live, virtual, and constructive simulators and simulations.

The primary purpose of the position is to conduct instructor and gunnery operator training courses for military personnel within [location] and to provide administrative and technical oversight over contractor operated gunnery simulators. The students are soldiers of the E-5 (Sergeant) and E-6 (Platoon Sergeant) rank from the National Guard, Reserve, and Active Duty. The appellant teaches small classes of one or two students on how to use the gunnery systems. The appellant is involved in hands-on training delivery that uses two simulators to rehearse how the soldiers would use the gunnery on the tanks or fighting vehicles. The course materials are standard packages received from Fort Knox or Fort Benning and are used by other posts with the same equipment. The three courses taught by the appellant are well structured and standardized and have ample training materials, but the appellant may make minor revisions to the lesson plans and support packages to meet the training needs of [location].

The appellant also serves as the Technical Oversight Representative (TOR) for the Contracting Officer's Technical Representative (COTR) who works with the Simulations, Training, and Instrumentation Command contract. In this capacity, the appellant monitors general contractor performance by ensuring that the contractor is fulfilling its contract responsibilities. The appellant serves as the technical contact through which the contractor can relay questions and problems of a technical nature to the COTR.

Series, title, and guide determination

The agency determined that the position is covered by the Training Instruction Series, GS-1712. The appellant does not disagree with the series determination, and we agree.

As stated in the Training Instruction Series, GS-1712, the position is titled and evaluated by application of the Grade Level Guide for Instructional Work. The type of work performed by the appellant determines the official title as well as whether Part I or II of the Guide is used to determine the grade level. The grade level criteria in the Guide are divided into two parts: Part I for instructor work and Part II for instructional specialist work. The instructor work performed by the appellant is characteristic of that described in Part I. The work covered by Part I involves preparing daily work (lesson) plans, conducting training in traditional classroom situations, evaluating the progress of students, and advising and assisting them to improve their performance. The appellant believes that his title should be Training Specialist/Contracting Officer's Technical Oversight Representative. Since his position is covered by Part I, it cannot be titled using Part II of the Guide. Therefore, the appealed position is allocated properly as Training Instructor, GS-1712. The agency may include a parenthetical title based on the instructions in the *Introduction to the Position Classification Standards*.

Grade determination

The criteria in the Guide cover two broad classification factors: *Nature of assignment* and *Level of responsibility*.

Nature of assignment

This factor encompasses such aspects as the knowledge, skill, and ability required to perform the work, and the complexity and difficulty of the duties and responsibilities assigned.

At the GS-9 level, the courses cover a wide variety of topics in well-established areas of a subject-matter field. They include courses taught by a technical service school in the fundamentals and skills of a technical occupation; courses taught at the secondary through basic undergraduate levels; or all subjects taught at an elementary school level. They require thorough familiarity with the assigned subject-matter area and use of a wide range of teaching methods or tools depending on the students' learning requirements. They are usually well structured and have ample training materials. These courses generally involve instructional problems that require organization, illustration, and interpretation of course material in order to reach and motivate students who may pose typical problems of communication and motivation, e.g., diverse ages, backgrounds, and levels of interest in the course. GS-9 instructors need to give concrete expression to the abstract principles and concepts taught at this level. They make recommendations for changes that involve substantive rather than procedural matters. Obtaining and adapting current instructional material is typical of this level.

At the GS-11 level, the courses cover advanced technical systems or subject-matter areas comparable to the upper-division undergraduate level. These courses are not in standardized or prestructured form, and they typically have source material problems (e.g., source materials may be excessively numerous, may be difficult to locate, or may be difficult to adapt). GS-11 instructors are responsible for overall maintenance of their assigned courses and determine the need for and initiate changes or updates in course content. Subject-matter problems result from technological changes or new developments in the field and require frequent updating of knowledge and course content by the instructors. The student problems relate to students with complicated, specialized, or persistent learning difficulties requiring the instructors to modify courses to meet their needs. They are substantially involved in the development or modification of the courses that are taught and frequently demonstrate techniques to trainee instructors and evaluate the performance of lower level instructors.

The duties of the appellant's position are characteristic of the GS-9 level. His primary responsibility is to provide training and instruction to military personnel for the M1 and Bradley fighting vehicle gunnery simulation systems. The purpose of the training is to teach the students how to use the simulators to replicate what they would do on a real tank or fighting vehicle. The courses taught by the appellant are comparable to those skills taught by a technical service school that teaches the fundamentals and skills of a technical occupation. The appellant uses a practical knowledge of the systems and knowledge of tactical gunnery to train soldiers in correct target acquisition and engagement methods. The students do not have special learning problems which would require the instructor to modify the course material. As discussed previously, the

course materials received from Fort Knox or Fort Benning are standard packages used at other posts with the same equipment. The appellant meets the criteria at the GS-9 level since he makes minor modifications to the well-structured training packages.

The appellant's duties do not meet the characteristics of the GS-11 level. The courses taught by the appellant are equivalent to those taught by a technical service school and not comparable to the upper-division undergraduate level as described at the GS-11. At this level, courses are not structured and often have course material trouble, such as too much material, no material, or hard to adapt material. Although the CCTT is a sophisticated training system which increased the total number of training devices and contractors, it does not add to the technical complexity of the subject-matter being taught. It also does not require the appellant to adapt or modify the technical manuals and training manuals. The limitations regarding the technical complexity of the courses taught, lack of student problems, and the standardization for course material precludes crediting his position at the GS-11 grade level.

This factor is evaluated at the GS-9 level.

Level of responsibility

This factor includes such things as independence (e.g., the degree to which work and decisions are supervised or reviewed); the extent to which guidelines for the work are available or must be developed; and the kinds of contacts required to perform the work.

At the GS-9 level, the instructors independently plan and carry out their training sessions within the prescribed course framework. They resolve normal classroom problems and make outside contacts for supplemental information and materials. On unusual matters or questions of program objectives and policy, they obtain guidance before taking action. Recommendations for course modification receive review for consistency with overall course material, for technical accuracy, and for educational adequacy. At this level, the courses of instructors are audited and evaluated periodically by higher level instructors. The GS-9 instructors may participate in task analyses for determining training requirements or in special staff studies of training and testing materials, for which they receive specific guidance on coverage, methodology, approaches, and sources to use.

At the GS-11 level, the instructors may receive course assignments with the source objectives, topics to be covered and general content in a prescribed form, but they typically participate in original course content development and in its subsequent modification. Within the framework of approved course objectives and topics to be covered, instructors at the GS-11 level use such methods as they believe will be most effective. They determine the need for additional subject-matter information and may meet with representatives of outside organizations in order to obtain it. They develop or adapt new or revised training or testing materials for normal course use. The material may be reviewed by the instructor's supervisor for technical accuracy, consistency with course objectives, educational effectiveness, and program policy.

The appellant's level of responsibility matches the GS-9 level. The appellant works independently, performing the full range of training and instruction, on-site contractor

surveillance, and facility coordination. The appellant performs his duties without detailed or specific guidance from his supervisor. The Supervisory Training Instructor is available to assist the appellant if there are conflicts with the contractor or other matters generally related to administrative processes. The appellant is expected to handle the technical aspects of gunnery target engagement and fire instruction in accordance with established tactical methods, procedures, and regulatory guidelines. The work is reviewed in terms of the quality of training provided to soldiers and adequacy of coordination and assistance provided to the on-site contractor. The appellant also submits a support plan to his supervisor on an annual basis that contains his duties and responsibilities related to both training instructor and TOR duties. Unlike the GS-11 level, the appellant does not participate in original course content development and its subsequent modification. The appellant is limited to making only minor suggestions for changes to the course material. Since the course material is standard and requires minimal modification, the appellant's position cannot be credited at the GS-11 grade level.

This factor is evaluated at the GS-9 level.

Summary

Since both factors are credited at the GS-9 grade level, we find that the appellant's work covered by Part I of the Guide is evaluated properly at the GS-9 grade level.

Decision

The appellant's position is properly classified as Training Instructor, GS-1712-9 (parenthetical title at option of the agency).