

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]

Agency classification: Facility Manager
GS-1640-11

Organization: [name] Library
Office of Presidential Libraries
National Archives and Records
Administration
[location]

OPM decision: Facility Manager
GS-1640-11

OPM decision number: C-1640-11-01

/s/ Robert D. Hendler

Robert D. Hendler
Classification Appeals Officer

March 4, 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:

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

Mr. Jerry Pirtle
Personnel Officer
Human Resources Operations Branch
National Archives and Records
Administration
9700 Page Avenue, Room 399
St. Louis, MO 63132-5100

Mr. Henry P. Leibowitz
Director of Human Resources Services Division
National Archives and Records Administration
8601 Adelphi Road
College Park, MD 20740-6001

Introduction

On October 26, 2000, the San Francisco Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from [appellant's name]. The case was received by the Philadelphia Oversight Division for adjudication on December 15, 2001. His position is currently classified as Facility Manager, GS-1640-11. He believes the classification should be Facility Manager, GS-1640-12. The appellant works in the [name] Library, Office of Presidential Libraries, National Archives and Records Administration (NARA), [location]. We have accepted and decided this appeal under section 5112(b) of title 5, United States Code (U.S.C.). OPM received the complete appeal administrative report on December 11, 2001.

General issues

In his appeal letter, the appellant states that his position description (PD) is somewhat accurate, but it does not capture all of his work responsibilities. He says that a new PD, developed by the Office of Presidential Libraries, more accurately describes his duties and daily work responsibilities. The appellant disagrees with the agency human resources office decision that the new PD also was properly classified to the GS-11 grade level. During the fact-finding process, both the appellant and his supervisor questioned the agency's use of a standard PD covering other presidential library facility managers since the [name] Library was substantially larger and more complex than the other presidential libraries.

The appellant's rationale relies, in part, on the description of work in his proposed PD. Agency management has certified that the appellant's PD of record ([number]) is complete and accurate. A PD is the official record of the major duties and responsibilities assigned to a position by an official with the authority to assign work. A position is the duties and responsibilities that make up the work performed by an employee. Position classification appeal regulations permit OPM to investigate or audit a job, 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. Therefore, this decision is based on the actual work assigned and performed by the appellant and sets aside any previous agency decision.

The appellant states that the Facility Management Series, GS-1640 PCS is written toward the operation of posts, camps, depots, power plants, parks, forests and roadways versus presidential libraries, and that his agency did not take into account the unique work requirements for a facility manager at a cultural institution. 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 adequacy of grade level criteria contained in a PCS or guide is not appealable. While grade level criteria do not cover all possible combinations of work, careful application of the appropriate PCS to the work that the appellant performs should yield the correct grade for his position. Any of his duties not specifically referenced in the PCS can still be evaluated by comparison with similar or related duties that the PCS does describe, and with the entire pattern of grade level characteristics.

We conducted a telephone audit with the appellant on February 7, 2002, and a telephone interview with his supervisor, [name], Director, [name] Library, on February 8. We obtained additional information on the appellant's program responsibilities in telephone interviews on February 20, with [name], Director, Office of Administrative Services, and on February 25 with [name], an engineer on her staff at NARA headquarters. While the proposed PD provides additional details about the appellant's work, our audit confirmed that the PD of record contains the major duties and responsibilities of the appellant's position and is adequate for classification purposes. We incorporate it by reference into this decision.

Like OPM, the appellant's agency must classify positions based on comparison to OPM PCS's and guidelines. Section 511.612 of 5 CFR, requires that agencies review their own classification decisions for identical, similar, or related positions to insure consistency with OPM certificates. Thus, the agency has the primary responsibility for ensuring that its positions are classified consistently with OPM appeal decisions. If the appellant believes that his position is classified inconsistently with those of other presidential library facility managers, he may pursue this matter by writing to his agency headquarters human resources office. In so doing, he should specify the precise organizational location, series, title, grade, duties, and responsibilities of the positions in question. The agency should explain to him the differences between his position and the others, or grade those positions in accordance with this appeal decision.

Position Information

The appellant serves as the facility manager for the [name] Library, overseeing building operation, maintenance, repair, improvement and protection services and programs. The developed facility site occupies 29 acres of a 100 acre tract. It contains a public museum, archives and research library, work areas for employees, and special storage areas. Museum exhibit space, a public research room, conference rooms and an auditorium occupy approximately 153,500 square feet. The land around the facility is owned by the [name] Foundation (Foundation) and managed through its Board. Under a joint use agreement with the Foundation, NARA is responsible for facility operation and maintenance. The Foundation occupies areas with the facility, and retains control of the outside areas.

The office space is used by 55 staff members, including Federal employees, private foundation support staff, volunteers, interns, and 26 contract employees. There is a special storage area for original text historic records, a vault for national security information, a museum object storage area and vault, and a cold storage area for audio-visual materials and documents. The facility has a kitchen, banquet facilities, and loading docks. The Federal government is in the process of planning an \$8 million addition adding approximately 30,800 square feet of internal space that will include an auditorium with seating for 500 people, and two rooms with dividing curtains that will support the presidential learning center, conference and school activities. The Foundation is adding approximately 85,000 square feet of interior space attached by a covered walkway to the existing building, and will house the Boeing 707 former Air Force One airplane. Both projects will also add approximately 130,000 square feet of exterior space, e.g., plazas. The appellant will provide facility support to both additions.

The appellant develops statements of work for and subsequently oversees continuing contracts. The maintenance and operations contract covers such items as heating, ventilation and air

conditioning (HVAC); plumbing, irrigation, electrical and fire systems, structural repair, signs and parking lot striping. It is staffed with a site manager and a maintenance helper. The contractor brings other trades and crafts personnel as needed to service these systems. The security guard contract is staffed with a Post Commander and a mixture of 19 full and part time guards. Typically four guards cover the day shift and two cover both the swing and night shifts. The contract includes monitoring the security and fire alarm systems. The janitorial service contract is staffed with one supervisor, five people daily, and one person on weekends. The landscape contract is staffed by a supervisor and one other person who both work a five day week. The fountain maintenance contract includes weekly cleanout of the courtyard fountain and repair if necessary. The elevator contract is staffed with a supervisor-worker who performs monthly maintenance and call back repairs on the one freight and four passenger elevators. There are three pest control contracts; one for the interior, one for the exterior, and a mouse abatement program. The appellant anticipates increased contractor staffing for the additional space. For example, the Federal addition will add three new elevators, and the interior space maintained will increase over 65 percent.

Series, title, and standard determination

The agency placed the appellant's position in the Facilities Management Series, GS-1640, for which there is a published PCS, and titled it Facility Manager. The appellant has not disagreed with the series and title of his position, and we concur.

Grade determination

The GS-1640 PCS covers positions that manage the operation and maintenance of buildings, grounds, and other facilities. While the series definition contains the list of facilities cited by the appellant, the grade level criteria measure administrative and managerial skills and abilities, and the technical knowledge of the operating capabilities and maintenance requirements of various kinds of physical plants and equipment common to managing any type of facility, including cultural institutions like presidential libraries and museums. The GS-1640 PCS uses three factors to evaluate positions: (1) Management factors - planning, budgeting, scheduling, coordinating, and utilizing staff, money, and material resources; (2) Technical factors - scope of equipment operation and repair, and nature of equipment and facilities; and, (3) Personal factors - the ability required to act in management-client relations, and management representation.

The PCS states that in considering the descriptions of levels, the presence or absence of a single feature should not be considered as grade controlling. Some variation will exist because of differences in work situations. Mention of a particular required knowledge or items of equipment at a grade level is not intended to indicate that this is the first level or the only level at which these features occur. Rather, it indicates that at that particular level these features exist on a constantly recurring and significant basis and are illustrative of the breadth of management problems typical of the level.

The application of this PCS requires that we consider the appellant's organization which varies substantially from illustrations in the GS-1640 PCS. Rather than managing a variety of trades and crafts personnel through subordinate working leaders typical of all grade levels in the PCS, the appellant does not supervise Federal employees. All facilities work is performed by

contractor personnel. The record shows that current and future expansion projects substantially increase the appellant's on-going program management demands.

The appellant pointed to several complicating factors, e.g., the facility is owned by and services are provided to a non-governmental entity, the multi-functional uses of the facility, and the impact of large number of visitors. The PCS Explanatory Statement recognizes the impact of conditions raised by the appellant and provides for their consideration in the grading process, e.g., the ownership and operating status of the facility, the organization and functions of the employing agency and its delegations of authority, the functional use of facility, the equipment used in or in conjunction with its operation, and the size and use of the surrounding grounds. In evaluating the position, we also must consider the roles of the [name] Foundation and NARA headquarters facility management, engineering, safety and security organizations.

Management factors

At the GS-11 grade level, the size of the operation and the demands made upon available space require the manager to use knowledge of space utilization to match space to functional requirements. The expanded size and scope of the operation increases the number of technical problems to resolve and requires greater attention to office management. More time is required to coordinate the work of the several shops under the manager's jurisdiction; organize and conduct formal training courses; deal with human resource issues, and emphasize and conduct the agency safety program. The manager must have a thorough knowledge of inventory management procedures because of the amount of work involved in this operation and the importance it plays in the management control process, and must know the operations of the storeroom and the stock levels required for operations. Managers must have the capacity to make budget estimates for new operations and prepare requests and justification for new methods and equipment. This requires knowledge of work production standards for maintenance work in all trades. While the manager typically gives instructions to trades and crafts personnel through intermediate subordinates, he or she is still directly interested in and concerned with some special problems, e.g., operations that involve or require the movement of heavy or cumbersome pieces of machinery. The size and scope of operations do not permit the manager to devote as much time directing daily operations as at the GS-9 grade level. However, in operating emergencies due to breakdowns of equipment, or other causes, the manager takes charge and directs remedial work.

Because of the inherent relationship with *Technical factors*, our evaluation of *Management factors* must consider the typical physical plant managed at each grade level. Illustrative of the GS-11 grade level is serving as the Facility Manager of a 600-bed capacity hospital under the general administrative direction of a hospital manager. The incumbent interviews applicants, selects employees, and performs similar personnel management functions. The manager prepares budget estimates; and with professional guidance, reviews the mechanical and structural features of the plant in order to effect improvements in the system. Plant operations and maintenance work is performed by a staff of 50 employees supervised by chiefs in charge of four sections: Buildings and Grounds Section, Utilities Section, Laundry and Dry Cleaning Section, and the Protective Section. The manager is involved in planning and is required to coordinate and set priorities for operations and maintenance work, and typically checks on the progress of each unit weekly. The manager supervises new construction, alterations, and improvements

ranging in value to approximately \$100,000 (this and other monetary amounts are inflation adjusted using the Bureau of Labor Statistics Consumer Price Index calculator). This includes the preparation of drawings and estimates for materials and labor required.

The incumbent is responsible for the enforcement of safety and fire regulations designed to protect the 1,000 patients and employees. The hospital consists of 40 structures with a gross floor area of 450,000 square feet situated on a 200-acre tract, and has a 10-acre cemetery on the grounds with 1,200 graves. The buildings range from permanent brick structures to a variety of temporary structures including Quonset huts. The climate is mild but is subject to a high rainfall. Supplies must be maintained in a warehouse because of the scope of operations and isolated location. Plant support requires special shops, e.g., carpentry, plumbing, electrical, paint, and machine shop. The hospital has a 40-ton refrigeration plant with five walk-in cold storage units, and operating needs frequently require the installation of additional refrigeration and air-conditioning equipment. The hospital is approximately 150 miles from the nearest city of 50,000 or more population. It uses hot water and steam for heating, cooking, laundry, cleaning, and sterilizing. Three 200-horse power high-pressure boilers and a standby diesel-electric system to be used in times of power failure are present. The hospital has a fleet of 15 motor vehicles which are repaired and maintained by the Motor Transport Unit. In addition to contacts with the medical, dietetic, and other hospital officials, the manager also deals with contractors, equipment salesmen, and officials from the national headquarters.

In contrast, the GS-12 grade level manager is concerned with fixing the guides and limits of authority for subordinates and establishing check points to be used in an overall evaluation of the program. The larger size of the staff requires spending more time with personnel management problems. The manager is required to spend more time in arranging or attending meetings and conferences with representatives of agencies occupying space or with suppliers of space, services, equipment, or materials, and preparing reports on both the technical and administrative aspects of the program for the information of higher management levels. Planning and dealing with new or unusual technical problems also occupy more time, e.g., disaster plans, egress to relocation sites, and developing relocation sites. Maintenance work requires the consideration of more and varied cost factors, and maintaining structural building soundness frequently involves a choice of procedures. The manager is responsible for balancing cost factors between preventive maintenance and major maintenance. As new developments occur in building design or operations, the manager must consider them from many aspects such as cost of installation versus improved service to building occupants, and operating costs. In addition, the manager must have a thorough knowledge of the technical aspects of the problem, and is responsible for interpreting technical specifications.

The GS-12 grade level illustration discusses directing all maintenance, repair, and alterations for a 1,200 bed hospital with a gross floor area of 930,000 square feet. Serving under the general administrative supervision of the hospital director, the incumbent is aided by a staff of 100 employees, supervised by an assistant manager and section chiefs in charge of the following sections: Administrative, Buildings and Grounds, Laundry, Protective, and Utilities. The Facility Manager supervises construction on building projects or alterations to the hospital's facilities, some exceeding \$100,000 in cost. The incumbent supervises the maintenance of records and the preparation of reports to be used in making estimates and to document action taken in the operation of a facility with annual costs amounting to approximately \$12 million or

more. The manager prepares the budget based on plans that he or she has developed for maintenance and repair work including needed new construction or alteration projects, the replacement of existing equipment and the procurement and installation of additional equipment. The incumbent supervises the purchase of operating and maintenance supplies, materials, and equipment. In preparing specifications, general guides are available, but the complexity of equipment or the need to adapt equipment to local conditions requires considerable ingenuity to prepare adequate specifications.

The plant consists of 84 buildings ranging from two new reinforced concrete structures to frame structures with siding, gypsum board partitions, and composition roofs located on 300 acres of land immediately adjoining a suburban community. The facility is served by: a boiler plant of 1,250 rated horse-power capacity and a complete steam distribution system including condensate and vacuum heating return systems; a complete sewage disposal plant providing primary and secondary treatment; a laundry; a fleet of 30 motor vehicles; and a garage for the maintenance and repair of equipment. The grounds surrounding the buildings contain a golf course, baseball diamond, tennis courts, flower gardens, 25 acres of orchard, a 30-acre truck garden, and lawns and landscaping. The proximity of the hospital to a large metropolitan area plus the number of members of the staff and patients (approximately 1,800) combine to make disaster planning a complex part of the assignment.

Although the size of the library's current and planned interior physical plant falls short of that typical of the GS-11 grade level, plant management demands counterbalance this weakness. Frequent changes in library use, e.g., expanding educational programs, accommodating major changing exhibits, and routinely dealing with large numbers of visitors for public events, requires the appellant to apply knowledge of space utilization to match space to functional requirements characteristic of the GS-11 grade level. The size and scope of the visiting population (over 173,000 last year with an estimated 10 percent increase each year for the next 3 to 5 years) and frequency of special events increases the number of technical problems to resolve and requires a greater attention to administrative matters typical of the GS-11 grade level. For example, the appellant accommodated the needs of significant numbers of law enforcement personnel visits of a heads of state, and regularly deals with the visits by the first family and major events staged by the Foundation. The current contractor staff does not exceed the numbers or types of personnel typically managed at the GS-9 grade level, but will expand to service the new additions. The expanded security and safety program demands of an active first family, frequent catered events, and large public presence require work coordination more typical of the GS-11 grade level. As at that grade level, the appellant prepares budget and cost estimates for major facility changes, and prepares requests and justifications for new equipment, e.g., major HVAC and other system upgrades. Typical of the GS-11 grade level, he is directly concerned with special problems, e.g., immediate first family and special visitor demands, and special archival preservation and collection protection.

The appellant's position does not meet the GS-12 grade level. The physical plant supported does not reflect the staff and/or contractor management demands typical of that level, e.g., coordinating specialized trades and crafts support to the myriad of utility, medical testing and services equipment, and grounds maintenance typified in the GS-12 grade level illustration. While the appellant attends meetings and conferences with representatives of the Foundation and with suppliers of services, equipment, and materials, they do not address the more complex

facility issues that result from managing a facility with GS-12 grade level technical complexities. Although some current expansion project planning issues approach the GS-12 grade level, that work is transitory and cannot be credited as typical of the appellant's regular and recurring work. The authority and responsibility retained by technical program management positions in NARA headquarters also limit the appellant's planning and program authority. Therefore, this factor meets the GS-11 grade level threshold.

Technical factors

At the GS-11 grade level, the size and volume of traffic usually make elevator maintenance a significant responsibility. The nature and size of operations at this level require increased attention to: firefighting and the operation and maintenance of the fire alarm and sprinkler system; the primary and secondary electrical distribution systems, with particular emphasis on the responsibility for interpreting tests of these systems; and the consideration which must be given to technical requirements in buildings maintenance to insure continued structural integrity. In addition to GS-9 grade level operating problems and work, GS-11 grade level operations frequently have added emphasis on roof construction and repair, partition construction, acoustical treatment, upholstery repair, floor equipment maintenance and repair, sheet metal maintenance, and maintenance of refrigeration systems. Another special feature which frequently is associated with this level of work is the responsibility for checking the food service operations or other concessions for compliance with contract requirements. They serve not only as building operations experts but as sources of information on regulations relating to the Federal Supply System; the GSA Communications System; short-order material, or labor and material procurement procedures; standard forms or sources of supply of standard forms; and police regulations and law as related to the work of guards. Typically, gross square footage of space assigned is around 400,000 to 600,000 square feet.

At the GS-12 grade level, the manager in charge of a building or group of buildings serves as the technical expert for the activity and may be called upon to furnish technical suggestions and advice on equipment used by other services located in the building. In this situation, the manager may have added responsibilities such as determining transportation requirements in terms of number and types of vehicles. Dealing with operating emergencies is not a particularly demanding part of the responsibility since subordinates in charge of operating shops have skills, knowledge, and sufficient authority to deal with most emergency situations. Subordinates also handle the daily operations, e.g., maintaining sewers, firefighting equipment, and operating the boiler plant. Unlike lower grade levels, the manager does not directly supervise the maintenance of record drawings showing important details of the physical plant, such as the location of sewers, power, or water lines. GS-12 grade level managers confront technical decisions and considerations with greater frequency because of the increased size or scope or both, of their responsibilities, e.g., when considering service demands for electric power and in planning to meet load requirements, the manager must be familiar with transformer capacities and characteristics and know when action must be taken to add or change equipment. At this level the manager is not particularly concerned with elevator maintenance since this is a daily operations problem. The GS-12 grade level manager is concerned with assuring that elevators and escalators are designed to provide sufficient capacity since this has a direct bearing on the smooth functioning of the building. Facility Managers, GS-12 are called upon to oversee or check up on the progress of construction of reinforced or masonry structures. This requires a

good knowledge of construction techniques and equipment. Typically, gross square footage of space is around one million square feet.

As discussed previously, the appellant is engaged in new construction and major renovation functions typical of the GS-11 grade level. For example, the appellant is responsible for air conditioning and refrigeration equipment; elevators; fire alarm and sprinkler systems; and facility support functions typical of the GS-11 grade level, e.g., guard services, food operations. While not as large as the typical GS-11 grade level physical plant, the appellant must deal with technical demands typical of that level, e.g., film, photograph and museum storage temperature and humidity requirements; support for large outdoor Foundation events; maintaining a 1.5 million gallon water tank for firefighting and domestic water use; and the effects of large numbers of visitors on maintenance and repair. While the appellant does not directly supervise the scope of trades and craft workload described in the PCS, he exercises non-engineering facility management responsibility for on-going maintenance and repair performed by contractors that approaches the GS-11 grade level in scope. For example, he is routinely involved in such projects as partition construction, large-scale carpet replacement, and parking and street light replacement. He assists Library management in formulating facility support needs, and functions as the contracting officer's technical representative (COTR) for those contracts. On locally controlled projects (up to \$25,000), he develops requirements, evaluates contractor responsiveness, inspects and approves work, and prepares justifications for changes and additional funding. His involvement in major projects offsets the weaknesses previously discussed. For example, the Library Director relies on him to comment at all design phases, monitor day-to-day construction work, and alert the NARA headquarters engineering organization on such issues as questionable construction materials.

Unlike the GS-12 grade level, the appellant deals directly with operating emergencies and emerging facility issues, particularly with regard to the first family and the Foundation. The structure is not so large and complex that subordinates in charge of major operating components have the skills, knowledge, and sufficient authority to deal with most operating emergencies and that the appellant uses others to oversee daily operations. As at the GS-11 grade level, he directly oversees the operating contractor supervisory staffs. The appellant's \$1.383 million 2000 operations and maintenance budget falls materially short of the typical \$12 million GS-12 grade level budget required to support a physical plant of GS-12 grade level scope and complexity. The library's technical support functions fail to meet those typical at the GS-12 grade level, e.g., the larger and more complex utility systems, motor vehicle fleet maintenance and repair, extensive and diversified grounds use, and large scale alteration and repair projects of a large hospital or other facility with equivalent support requirements. Therefore, this factor meets the GS-11 grade level threshold.

Personal factors

At the GS-11 grade level, along with technical and managerial skills, the manager is expected to be able to explain the billing system on reimbursable work and to persuade users of service to accept compromise offers. They must have a background of the objectives, history, and development of the program of their agency as a guide in making decisions in more complex situations. In addition to contacts with the medical, dietetic, and other hospital officials, the incumbent also deals with contractors, equipment salesmen, and officials from the national

headquarters. At the GS-12 grade level, the manager also must be able to represent the agency in negotiations with architects, engineers, and contractors.

The appellant has the full range of contacts typical of the GS-11 grade level, including working with the Foundation to resolve operating issues. As at that grade level, he deals with contractors on locally supervised construction, alteration, and improvement projects and with officials from higher level organizations on more complex projects. While he deals with architects, engineers and contractors and functions as a COTR, the appellant is not responsible for program operations and projects of GS-12 grade level scope and complexity. These functions are retained at NARA headquarters. Therefore, this factor must be evaluated at the GS-11 grade level.

Summary

Based on the preceding analysis, we have evaluated the appellant's position at the GS-11 grade level for all factors, resulting in evaluation of the appellant's facilities management work at the GS-11 grade level.

Decision

The position is properly classified as Facility Manager, GS-1640-11.