

109957



LM109957

REPORT BY THE

Comptroller General

OF THE UNITED STATES

~~10,830~~
10,835

Development Of The Classification Standard For Flight Service Station Specialists

The former Civil Service Commission developed classification standards for air traffic controllers and flight service station specialists from 1976 to 1978.

The standard for flight service station specialists, issued shortly after the standard for air traffic controllers, was criticized by officials of the Department of Transportation and an employee union. The union believed that the Commission's handling of the flight service station specialists' case was improper and inconsistent, compared with the air traffic controllers' case.

GAO concludes that the Commission's Standards Division acted consistently in developing the standard and generally followed normal procedures. Although it was not routine for Commissioners to get involved in the classification process, it was within their authority to intervene directly in the decision-making process and overrule or sustain the Standards Division's actions.



109957



~~005956~~
109957

FPCD-79-52

JULY 25, 1979



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-164497(1)

The Honorable David H. Pryor
Chairman, Subcommittee on Civil
Service and General Services
Committee on Governmental Affairs
United States Senate

SEN 06610

The Honorable Ted Stevens
Ranking Minority Member
Subcommittee on Civil Service
and General Services
Committee on Governmental Affairs
United States Senate

SE 11

This report responds to the September 22, 1978, request (app. II) from the previous Chairman and the ranking minority member, Subcommittee on Civil Service and General Services, Senate Committee on Governmental Affairs, that we review the establishment of the classification standard for the flight service station specialist occupation. As agreed with the subcommittee staff, this review was not to reevaluate the occupation or recommend changes in the standard but to determine if normal procedures were followed by the Civil Service Commission (CSC) 1/ in developing the standard. ✓

As a result of agency and union dissatisfaction with the classification standard for the air traffic control occupational series, the Department of Transportation, in 1975, requested CSC to develop a new classification standard. (This series includes air traffic controllers,

1/Public Law 95-454, the Civil Service Reform Act of 1978, transferred the authority to prepare classification standards from CSC to the Office of Personnel Management. Actions pertaining to the classification of flight service station specialists referred to in this report were taken by CSC officials and commissioners; therefore, we refer to CSC rather than the Office of Personnel Management in reference to past actions.

relationship was made between volume and complexity and, as such, was considered an appropriate grade determining guide. According to CSC, the decision not to use the Factor Evaluation System format was motivated by the controversial nature of this classification study and the need to issue the standard as quickly as possible.

A detailed discussion of the classification study, as well as the various disagreements and issues that arose during the study, is included in appendix I.


Comptroller General
of the United States

C o n t e n t s

APPENDIX		<u>Page</u>
I	CLASSIFICATION OF FLIGHT SERVICE STATION SPECIALISTS	1
	Introduction	1
	Need to reclassify air traffic control occupations	3
	CSC's classification review of air traffic control occupations	4
	Conclusions	11
	Agency comments	12
II	LETTER DATED SEPTEMBER 22, 1978, FROM THE SUBCOMMITTEE ON CIVIL SERVICE AND GENERAL SERVICES, SENATE COMMITTEE ON GOVERNMENTAL AFFAIRS	13
III	LETTER DATED MAY 25, 1979, FROM THE DIRECTOR, OFFICE OF PERSONNEL MANAGEMENT	15
IV	LETTER DATED JUNE 20, 1979, FROM THE ASSISTANT SECRETARY FOR ADMINISTRATION, DEPARTMENT OF TRANSPORTATION	16

ABBREVIATIONS

CSC	Civil Service Commission ✓
DOT	Department of Transportation ✓
FAA	Federal Aviation Administration ✓
FES	Factor Evaluation System
NAATS	National Association of Air Traffic Specialists ✓
OPM	Office of Personnel Management
PATCO	Professional Air Traffic Controllers Organization ✓

DLG 02259

CLASSIFICATION OF FLIGHT SERVICE STATION SPECIALISTSINTRODUCTION

The Classification Act of 1949 was implemented to insure that Government employees have equal pay for equal work and that variations in rates of basic compensation paid to employees be in proportion to substantial differences in difficulty, responsibility, and qualification requirements of the task performed. This act created a pay structure called the General Schedule; established 18 grades, or levels of work, into which all positions covered were to be placed; and broadly defined the job difficulties and responsibilities for each of the grade levels which would be described in published standards.

The act provided that CSC would develop these standards and group positions into classes sufficiently similar as to (1) kind or subject matter of work, (2) level of difficulty or responsibility, and (3) qualification requirements. Within CSC, the Standards Division was responsible for evaluating the nature and tasks of Government jobs and for developing qualification and classification standards. Under the Civil Service Reform Act of 1978, these functions were transferred to the Staffing Services Group of the Office of Personnel Management (OPM).

Using the classification standards as guides, agencies classify their GS-1 through GS-15 positions. Positions above GS-15 must be approved by OPM.

Reevaluation criteria and evaluation method

OPM is responsible for revising existing position standards and for composing new standards. It gathers information on classification standards needs from agencies, employee unions, and other affected parties. After analyzing the information, it determines whether to revise the standard.

When OPM makes an occupational study, it must decide whether to rewrite the standard and, if so, what job evaluation method to use. Until recent years, the traditional narrative approach to job evaluation was used. Under this method, standards writers selected from a universe of eight factors (aspects of a particular job) those factors for comparison which best distinguished the levels of performance. The standards were then written in a narrative format, with no attempt to assign specific weight to the various factors.

An alternative to the narrative approach to position evaluation was initiated in 1976. Standards under this Factor Evaluation System (FES) are written in a narrative format, but all nine specified factors must be used to analyze an occupation, with each factor assigned a range of numerical values appropriate for the occupation. Once all nine factors are accounted for, the numerical values are aggregated. Each total falls within a numerical range defining a certain grade level. Eventually, most non-supervisory positions are to be classified under FES.

Air traffic control occupations

Within the Department of Transportation (DOT), the Federal Aviation Administration (FAA) is responsible for activities related to air traffic control. FAA is responsible for regulating and promoting civil aviation in order to foster its development and safety and to provide for the safe and efficient use of airspace by both civil and military aircraft.

FAA has divided air traffic control into three major functions: (1) preflight briefing and assistance and advisory services to pilots during flight--provided by air traffic controllers (station), also referred to as flight service station specialists, (2) control and separation of en route air traffic--provided by air traffic controllers (center), and (3) control and separation of air traffic at airports--provided by air traffic controllers (terminal).

Flight service station specialists provide pilots with a variety of information and assistance. They furnish weather and aeronautical information pertinent to planning or completing intended flights which may be given either before or during actual flights. Briefings generally are considered the most difficult function performed by the specialist. Specialists also provide flight plan assistance, which can include assisting in the choice of routes, obtaining clearances, and actual recording of the pilots' flight plans. Specialists also provide airport advisory services for landing and departing aircraft at airports without an air traffic control terminal or where terminals are open less than 24 hours. These services may include (1) furnishing information on field and weather conditions, runways in use, location of known traffic and (2) dealing with actual or potential emergencies. Although these services are available to all types of aviation, including commercial and military, the general aviation pilot is the largest single user. (General aviation aircraft includes all noncarrier aircraft.)

In 1977 there were about 4,000 flight service station specialists at 321 facilities comprising 46 Level III (GS-11), 180 Level II (GS-10), and 95 Level I (GS-9) stations.

Air traffic controllers (center and terminal facilities) separate and control air traffic on a real-time basis. Centers control and separate aircraft operating in controlled airspace under Instrument Flight Rules from other aircraft en route along major airways. While centers also provide traffic advisory services to aircraft operating under Visual Flight Rules procedures, their primary responsibility is to the en route Instrument Flight Rules aircraft. The centers use constant radar surveillance to issue speed, altitude, and directional instructions to pilots for keeping aircraft properly separated.

Terminal facilities control air traffic within an area surrounding an airport. Terminals issue control instructions to provide separation and insure the orderly and expeditious movement of aircraft departing, landing, approaching for landing, or flying within and between terminal areas; to control the movement of aircraft and vehicles on the airport's surface; and to furnish information to pilots concerning clearances to operate aircraft, weather and flying conditions, and pertinent operating and procedural instructions.

NEED TO RECLASSIFY AIR TRAFFIC
CONTROL OCCUPATIONS

CSC had issued three occupational standards for the air traffic control series--in 1958, 1963, and 1968. The 1968 standard for this series was in a narrative format, with no quantification of the jobs' functions. FAA found it could not implement the standard without having quantified activity data for each grade level. Thus, to implement the 1968 standard, FAA issued the "Organization and Classification Guidelines for Air Traffic Control," which assigned numerical criteria to the narrative descriptions contained in the standard.

The Professional Air Traffic Controllers Organization (PATCO) and the National Association of Air Traffic Specialists (NAATS) were dissatisfied with FAA's 1968 classification guidelines. They believed that work factors had changed and that the numerical measurements were not valid. Additionally, they believed radical changes in the job function had occurred or were anticipated because of automation. PATCO and NAATS also felt that the complexity of the work situation was not appropriately measured or quantified. They were also convinced that volume breakpoints,

used to determine grade levels at facilities, were not adequately rationalized and should be changed to allow for grades above the maximum GS-13 for controllers and GS-11 for specialists.

As a result of the dissatisfaction with the FAA guidelines, both unions negotiated clauses into their 1973 contracts with FAA, agreeing that joint classification studies would be undertaken with FAA to examine the guidelines.

The two studies were made in 1973 and 1974. Both studies concluded that the FAA guidelines needed revising and that the CSC classification standard was no longer accurate. The PATCO-FAA study concluded that volume was a very important factor in determining control or grade levels, but it was not as dominant a factor as implied in the 1968 standard or as set forth in the guidelines. The basic conclusion of the PATCO-FAA study was that the standard must be revised and rewritten to recognize complexities other than volume. Similarly, the NAATS-FAA study concluded that the FAA guidelines and CSC classification standard did not properly consider the complexity factors in determining grade levels. Both studies recommended that DOT request CSC to study and develop a new classification standard.

Partly on the basis of these studies, DOT, in August 1975, requested CSC to develop a new classification standard for the air traffic control occupational series, GS-2152. DOT maintained that a revised standard recognizing the complexities of the air traffic control system was needed.

After reviewing the joint studies, CSC agreed that a classification review was needed and in early 1976 began its study.

CSC'S CLASSIFICATION REVIEW OF AIR TRAFFIC CONTROL OCCUPATIONS

CSC's review consisted of a three-phase study approach. In phase 1, CSC would develop classification standards for air traffic controllers (terminal and center). In phase 2, it would develop such standards for the flight service station specialists. In phase 3, it would discern and define qualification standards for the air traffic control series (station, terminal, and center).

Although most new classification standards were being developed in the FES format, CSC believed that this would cause delays and would require further fine tuning of FES's measurement tools. To avoid such delays, CSC used the non-FES format. Furthermore, CSC deemed it unwise to use a new approach on a controversial occupational series.

CSC's procedures for conducting an occupational study were outlined in a guide for standards writers. The guide did not describe, prescribe, or limit actions taken during the study but permitted each standards writer to select the methods, procedures, and techniques which would best accomplish the project.

To determine if normal classification standard procedures were followed for the flight service station specialist standard, we reviewed established guidelines and procedures followed in other occupational standards, including air traffic controller (terminal and center); nurse series, GS-610; border patrol series, GS-1896; diagnostic radiologic technologist series, GS-647; and environmental engineer series, GS-819. Our analysis included (1) interviewing, where possible, standards writers who were involved in developing these standards and (2) examining the related case files. In the latter four classification standards, the files were much less detailed than those for the flight service station specialists and air traffic controllers.

CSC officials stated that all standards studies were unique, requiring the standards writer to adjust his approach to fit the particular standards project. In reviewing the standards, we found differences in initiation of the studies; methods of job evaluation; union, agency, and professional society involvement; scope; and number of factfinding visits.

The basic steps followed in developing the standards were similar, and each of the studies was initiated because of the obsolescence of the existing standards. The environmental engineer, flight service station specialist, air traffic controller, and diagnostic radiologic technologist studies were initiated by agency request; the nurse standard was initiated by CSC. All of these standards were written in the FES format, with the exception of the air traffic control series.

In all of the studies, CSC sought early involvement from interested agencies, unions, and professional groups through project initiation letters or telephone calls. In developing the final classification standards, it sent copies of the draft standards to interested parties and requested their comments. CSC reviewed all submissions and, in some cases, incorporated these comments into the final standards.

The air traffic control series studies experienced more involvement by unions than the other studies we reviewed.

Because of the possibility of widespread work slowdowns by controllers, the Commissioners intervened directly in the decisionmaking process. PATCO was granted a personal hearing by the Commissioners who overturned the Standards Division's position which resulted in a one-grade increase for controllers over what the Standards Division had recommended. NAATS was also granted a personal hearing, but it was unsuccessful in its appeal for higher grades for flight service station specialists. Although there was a varying degree of interest by the involved unions and professional societies in the four other cases we reviewed, none approached the degree of involvement evidenced by the air traffic control series.

These studies had little impact on grade levels for the environmental engineer, border patrol agent, and diagnostic radiologic technologist. The new nurse and air traffic controller standards, however, resulted in a number of position upgrades. CSC's estimate of the total number of flight service station specialist grade changes at the time the final standard was issued was 172 downgrades and 228 upgrades.

The classification study of flight service station specialists involved a number of issues. Although some of these issues were resolved, many disagreements still exist among NAATS, FAA-DOT, and CSC. Major areas of dispute include the activity volume formulas, the breakpoints for determining grades, the measurement of the complexity factor, and the treatment at the appeals hearing with CSC. NAATS officials contended that CSC ignored their comments on the draft standard. In addition, CSC's phased approach has also been a target of criticism by NAATS. NAATS blames the phased approach for the Commissioners' unfavorable decision and contends that it opposed the phased study approach from inception. However, NAATS did not formally object to CSC about the approach.

Activity volume formula

Pilot briefings, flight plan processing, radio contacts, and airport advisories are all functions of the flight service station specialists. CSC concluded that only the pilot briefings and aircraft contacted were relevant indicators of level of performance. Because of this, the activity volume formula was changed to use only these criteria. All parties agreed that pilot briefings represented the highest demands for the specialist and that this factor should be weighted more heavily in the formula.

The study showed that flight plan handling did not require a high skill level, and, as a result, flight plans were eliminated from the volume formula. NAATS and DOT objected to this conclusion.

NAATS stated that flight plans are assigned increased importance by DOT and are comprising a greater share of the workload. It agreed that the 1968 classification standard gave too much credit to the difficulty of flight plans. It contended, however, that eliminating the point value for the activity was unjust and ignored a major function of flight service station work. DOT argued for crediting flight plans on the basis of search and rescue responsibility for Visual Flight Rules flights. CSC countered that Visual Flight Rules flight plans pertained to only one-third of the total flight plans and that the scope of Visual Flight Rules search and rescue operations could not be accurately assessed. DOT ultimately agreed that flight plans should be eliminated from the volume formula.

CSC conclusions on the relationship between aircraft contacted (generally initial contacts with in-flight aircraft), total radio contacts, and airport advisories also were disputed by NAATS. In analyzing the volume data for these three factors, CSC found a strong, but not precise, relationship between the number of aircraft contacted and the number of airport advisories and radio contacts. It believed that the use of radio contacts and airport advisories produced a distorted relative ranking of stations. It concluded that the initial contact for advisory service and the initial radio contact with an en route aircraft alone illustrated the influence of advisory services and radio contacts with aircraft.

NAATS officials argued that airport advisories should be part of the total flight services' activity formula and that the count of all radio contacts should be substituted for the count of aircraft contacted. NAATS officials asserted that there was no support for the reasoning that aircraft contacted provided a measure of the range of potentially different situations. More important, according to NAATS, to ignore the work performed for radio contacts and advisory services showed poor judgment and poor management. The officials believed that such operations were important to the complete functioning of a station and, as such, should be recognized. NAATS believed that, by not crediting all job responsibilities and duties, CSC was violating a prime function of classification and undermining the proper functioning of flight service stations' total operation.

Breakpoints

NAATS also expressed concern over the determination of the volume level breakpoints (ranges of levels of flight services) which determine grade levels. For the study, CSC started with the premise that FAA's volume formula was consistent with the 1968 standard. CSC requested FAA's rationale for setting the grade breakpoints contained in the guidelines. FAA, however, was unable to reconstruct the rationale that went into setting the breakpoints when implementing the 1968 standard. Volume ranges used at that time follow.

<u>Grade</u>	<u>Flight services</u>
GS-9	0 to 99,999
GS-10	100,000 to 399,999
GS-11	400,000 plus

The volume formula used to determine flight services follows: flight plans x 2 + pilot briefings x 2 + aircraft contacted = total flight services.

CSC found that flight plans represented about 28.5 percent of the total flight service count. To remove flight plans from the formula, the breakpoints were reduced by 25 percent. The remainder of the formula was left intact, and a buffer zone of 5 percent was provided to overcome small fluctuations.

Current volume ranges follow:

<u>Grade</u>	<u>Flight services</u>
GS-9	0 to 74,999
GS-10	75,000 to 299,999
GS-11	300,000 plus

NAATS maintained that reducing the breakpoints by the same proportion that flight plans comprised of the total volume count was erroneous for at least two reasons:

- Flight plans comprised 40 percent of the volume formula; therefore, the breakpoints for grade levels should also have been reduced by at least 40 percent.
- The FAA classification guide did not contend that flight plans constituted 25 percent of the weight simply because they comprised 25 percent of the national total.

In addition to developing the formula for determining total flight services, CSC developed an alternative approach which could be used if a station failed to meet the cutoff for the higher grade solely on total flight services. This approach used pilot briefings, the one function that all parties considered the most difficult.

The minimum pilot briefing levels used for this alternative volume criterion were determined by analyzing those stations which grouped around 75,000 and 300,000 total flight services--the GS-10 and GS-11 breakpoints. CSC found that only 1 station providing 300,000 or more flight services (GS-11 stations) had less than 125,000 pilot briefings. It discovered that 5 GS-10 stations had more than 125,000 pilot briefings. Since these 5 stations ranked within the 5 percent buffer zone for retaining grade levels (285,000 to 300,000 total flight services), they were considered to be GS-11. Thus, 125,000 pilot briefings were considered to represent the minimum pilot briefing level for GS-11.

In setting the pilot briefing criterion for GS-10, CSC found that 89 percent of the GS-10 stations (between 75,000 and 300,000 total flight services) provided more than 25,000 pilot briefings annually. There were 21 GS-10 stations with less than 25,000 briefings and 9 GS-9 stations with more than 25,000 briefings. Thus, those GS-9 stations with 25,000 or more pilot briefings a year were determined to be GS-10 stations. The pilot briefing alternative was also assigned a 5 percent buffer for grade retention.

DOT officials agreed with the volume criteria formula and the alternative pilot briefing criterion. They felt, however, that a revised breakpoint schedule should be established to allow for an additional grade level--GS-12. Similarly, NAATS believed higher grade levels were justified on the basis of the changes in the formula and breakpoints it proposed.

Formula and breakpoint changes proposed by DOT and NAATS were intended to mathematically justify higher grades. Classification standards are not normally based so strictly on quantified activity or services provided. In this case, formulas and activity volume could improperly suggest that classification and grade determinations are, or can be, scientifically accomplished without relying on judgment. In the case of the flight service station specialist position, CSC judged that such a position did not warrant a grade higher than GS-11. The volume counts were to be used only to aid in distinguishing performance levels among the existing GS-9, 10, and 11 facilities.

Work situation factors--complexity

Both the 1968 and 1978 standards described work situation factors to allow for flexibility in conforming grade level determinations to classification principles. These factors included a number of key environmental and operational characteristics of each station's flight plan area to be evaluated along with the level of flight service activity. For example, the number of airports associated with a particular station influences the level of difficulty of flight service work. Specialists must familiarize themselves with airport layout, approach and departure patterns, runway capacities, and airport services.

All parties agreed that the 1968 standards did not show the actual work situation and had not been used in grade level determinations.

In addition, NAATS and FAA felt that the 1978 standard's descriptions of work situations were unreliable and meaningless. In practice, however, work situation factors have no effect on grade determinations because complexity of the work situation is not considered--volume criteria remain as the sole basis for determining levels of performance.

CSC had requested FAA to determine a complexity factor that could be used to weigh each facility's responsibilities and duties. FAA maintained, however, that complexity was very difficult to define and that any determination of what was complex would be strictly subjective.

FAA discerned a strong correlation between complexity and volume per station; that is, the complexity of work at higher volume facilities is normally more difficult. Larger stations usually involve more navigational aids, more complex equipment, more airspace, more variety of aircraft and pilots, and more airports. For this reason, the nature of the work generally would be harder at a facility that does a larger volume, regardless of location and staff size. FAA concluded that the best representation of the work that is performed by a facility is the amount of volume a particular station is doing.

Commission appeal

Because of NAATS's disagreement with CSC's draft standard, it requested a meeting with the CSC Commissioners. The meeting was held on May 10, 1978. A similar meeting

had been held between PATCO and CSC subsequent to the issuance of the draft standard for air traffic controllers (terminal and center) in late 1976.

During the May hearing, NAATS representatives basically restated the comments previously submitted to CSC in writing; no new issues were introduced. The Commissioners were not convinced by NAATS's presentation and directed that the classification standard be issued in accordance with the Standards Division's findings.

NAATS believes that the Commissioners of the previous administration who heard the PATCO appeal were concerned, attentive, and receptive to the issues presented. Conversely, NAATS felt that the new Commissioners conducted the hearing on a pro forma basis without genuine concern.

CONCLUSIONS

Performance level for the air traffic control occupational series is determined solely on the measurement of activity volume, even though the standard would permit consideration of other work situation factors. The new standard for flight service station specialists was based on the method developed in the 1968 FAA guidelines with adjustments to remove credit for the less difficult function of processing flight plans. NAATS officials contend that, to properly classify the flight service station specialist positions, all job functions should be used in determining the performance level. CSC's study showed, however, that pilot briefings and aircraft contacted represented the most difficult technical demands on flight service station specialists and established the activity formula with only those two elements.

In setting the breakpoints, CSC was unable to obtain the rationale for the breakpoints used in FAA's former guidelines. Having no other basis, CSC adopted the previously established breakpoints used by FAA and adjusted them to show the deletion of flight plans from the formula.

Although there may be some question over the use of an arbitrary and apparently unsupported determination of breakpoints, it did not affect the maximum grade levels. CSC determined that the highest level of nonsupervisory work described in the flight service station specialists standard was GS-11 and that there was no regularly occurring work above GS-11 in this occupation.

There also seems to be some question as to the Commissioners' involvement in controller and specialist cases and

the decisions made by two different Commissions. In fact, the Standards Division in both cases recommended no increases in the maximum grade levels. The Division's recommendation was overturned, however, in the controllers' case but not in the specialists' case.

Developing classification standards is recognized as imprecise and subject to judgment. The basis for grading positions is established in chapter 51, Title 5, United States Code, and standards must be based on these principles. CSC's procedures for soliciting comments and suggestions from affected parties were designed to make available information and viewpoints which could affect the outcome of the studies but should not necessarily have been substituted for the judgment of CSC.

Even though disagreements exist over the conclusions reached by CSC in developing the standard, it was within CSC's authority to make such judgments. Similarly, it was within the Commissioners' authority to directly intervene in the decisionmaking process and to overrule or sustain the Standards Division's actions.

AGENCY COMMENTS

OPM and DOT generally agreed with the content and conclusions of the report. Although DOT agreed that CSC followed proper procedures in developing the standard, it believes that certain flight service station specialist positions should be classified at the GS-12 level. (See apps. III and IV.)

ABRAHAM RIBICOFF, CONN., CHAIRMAN
 HENRY M. JACKSON, WASH.
 EDMUND S. MUSKIE, MAINE
 THOMAS F. EAGLETON, MO.
 LAWTON CHILES, FLA.
 SAM NINN, GA.
 JOHN GLENN, OHIO
 JIM SASSER, TENN.
 MURIEL HUMPHREY, MINN.
 RICHARD A. WEGMAN
 CHIEF COUNSEL AND STAFF DIRECTOR

CHARLES H. PERCY, ILL.
 JACOB K. JAVITS, N.Y.
 WILLIAM V. ROTH, JR., DEL.
 TED STEVENS, ALASKA
 CHARLES McC. MATHIAS, JR., MD.
 JOHN C. DANFORTH, MO.
 H. JOHN HEINZ III, PA.

SUBCOMMITTEE
 JIM SASSER, TENN., CHAIRMAN
 EDMUND S. MUSKIE, MAINE
 MURIEL HUMPHREY, MINN.
 TED STEVENS, ALASKA
 H. JOHN HEINZ III, PA.
 JOHN KNOX WALKUP
 CHIEF COUNSEL AND STAFF DIRECTOR

United States Senate

COMMITTEE ON
 GOVERNMENTAL AFFAIRS
 SUBCOMMITTEE ON CIVIL SERVICE AND
 GENERAL SERVICES
 WASHINGTON, D.C. 20510

September 22, 1978

Honorable Elmer B. Staats
 Comptroller of the United States
 General Accounting Office
 441 G Street
 Washington, D.C. 20548

Dear Mr. Staats:

On June 27, 1978, the Bureau of Policies and Standards of the Civil Service Commission issued a new classification standard for the flight service specialists in the Air Traffic Control series (GS-2152).

Since the new standard was issued we have received a large number of complaints from affected employees. The majority of the complaints are focused on the grade value of the levels of work described in the standard. Many feel that the new standard is lacking in that it fails to provide performance recognition above the GS-11 grade level. It is contended that the duties and responsibilities of those specialists who work at the busiest flight service stations are comparable to the GS-12 level and that their pay level should be properly adjusted.

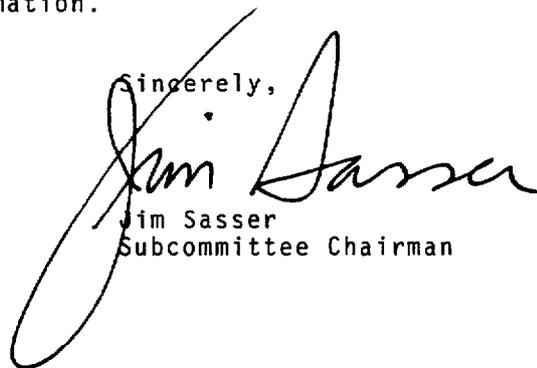
While it may be impractical for you to recreate all of the steps taken by the Civil Service Commission in composing the new standard, we are hopeful that you can review the standard from a managerial standpoint in order to ensure that normal classification procedures have been adhered to. We would also hope that in conducting this study you would review the new standard and give us the benefit of your views and recommendations on the level of performance question.

Elmer B. Staats
Page Two
September 22, 1978

Additionally, flight service specialists are only one of the many occupational groups who will undoubtedly have their classification standards rewritten as the Factor Evaluation System of position classification is implemented. We also hope that you will identify and give consideration to the particular problems, if indeed there are any, which may reoccur as standards for other groups are rewritten and as the new FES system becomes operational.

Your assistance in this matter and all other matters is greatly appreciated. Please do not hesitate to contact us for any additional information.


Ted Stevens
Ranking Minority Member

Sincerely,

Jim Sasser
Subcommittee Chairman

United States of America
**Office of
 Personnel Management**

Washington, D.C.

MAY 23 1979

in Reply, Refer to

OMB No. 5010-104

Mr. H. L. Krieger
 Director, Federal Personnel and Compensation
 Division
 General Accounting Office
 Room 4001, 441 G Street NW.
 Washington, D.C. 20548

Dear Mr. Krieger:

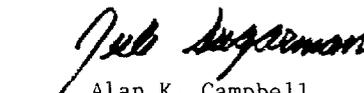
This is in response to your letter of May 10, 1979, requesting our review and comment on the draft report on the classification of flight service specialists.

Overall, we believe the proposed report accurately reflects the procedures followed in the conduct of the occupational study and the development of the classification standard for this occupation. Therefore, we have very few comments to offer on the substantive issues or the conclusions drawn in the proposed report.

Our detailed comments and recommended revisions are enclosed for your consideration. Where we felt some comments were necessary for the sake of accuracy or clarity we have also suggested appropriate revisions to the text of the report. My staff is available to provide any additional information concerning our comments and recommendations.

Your staff is to be complimented on their handling of a very technical classification subject.

Sincerely yours,


 Alan K. Campbell
 Director

Enclosure

GAO note: The enclosure containing technical or editorial comments on specific portions of the draft report was considered, and changes were made, where appropriate, in preparing the final report.

GAO
 5010-104



OFFICE OF THE SECRETARY OF TRANSPORTATION
WASHINGTON, D.C. 20590

ASSISTANT SECRETARY
FOR ADMINISTRATION

JUN 11 1979

Mr. Henry Eschwege
Director
Community and Economic
Development Division
U. S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Eschwege:

We have enclosed two copies of the Department of Transportation's (DOT) reply to the General Accounting Office (GAO) draft report, "Classification of Flight Service Station Specialists."

If we can further assist you, please let us know.

Sincerely,


Edward W. Scott, Jr.

Enclosure



DEPARTMENT OF TRANSPORTATION REPLY
TO
GAO DRAFT REPORT
ON
CLASSIFICATION OF FLIGHT SERVICE
STATION SPECIALISTS

SUMMARY OF GAO FINDINGS

The report is fact-finding and contains no specific recommendations to the agency or Congress. The review was performed to determine if normal procedures were followed by the Civil Service Commission (CSC) in development of its air traffic controller and flight service station (FSS) specialist classification standards.

GAO states that the Standards Division for CSC, after its study of controller and specialist classification standards, concluded that no grade increases were warranted; however, the CSC Commissioners overruled the Standards Division and permitted a one grade higher performance level for air traffic controllers (GS-13 to GS-14) but not for flight service station specialists (GS-11). GAO further states that officials of the National Association for Air Traffic Specialists (NAATS) were dissatisfied with this decision. They believed that CSC's new formula -- using volume counts -- did not measure all significant job tasks and that breakpoints used to determine grade levels were arbitrary and unreasonable. They also charged that the Commissioners' handling of the FSS specialists' case was improper and inconsistent.

GAO concludes that the development of classification standards is imprecise and subject to judgment; that CSC may have gone beyond what its normal procedures require (e.g., personal involvement of the Commissioners), but that the Commissioners' actions were not unprecedented nor outside the scope of their authority. GAO further states that there were some departures from normal procedures but these, too, were within CSC's authority. This involved the use of volume counts for determining level of performance and the decision to use narrative format for writing the standard rather than the new Factor Evaluation System (a system developed in 1976 that utilizes nine specified factors with each factor assigned a weight appropriate for the position). GAO notes that although position classification is generally not based on volume counts, in this case a direct relationship was made by CSC between volume and complexity and, as such, was considered an appropriate grade determining guide.

POSITION STATEMENT

The GAO correctly notes in its report that as a result of agency and union dissatisfaction with the classification standards for the air traffic control occupational series, which includes FSS specialists, the

Department of Transportation in 1975 requested that the CSC (currently Office of Personnel Management) develop new classification standards. It was the Department's and the agency's expectations and point of view that selected air traffic control and FSS facilities should be elevated one grade level.

Although the GAO concludes, and we agree, that proper procedures were followed by the CSC, we continue to be convinced that high-volume FSS facilities should be established at the GS-12 level. Nothing in the report changes this belief or resolves this dilemma.

The Department and FAA believe that the grade determining criteria established for FSSs should be reconsidered. We agree that volume used by the CSC as its classification standard is a legitimate measure of complexity in FSS work; however, there are currently several FSSs that exceed the breakpoint established for the GS-11 grade by more than double the standard, and these, we believe should be classified as GS-12 stations. At the request of the Secretary of Transportation, the Office of Personnel Management has agreed to review the volume level breakpoints contained in the standard and reconsider the establishment of a GS-12 level. We hope this additional review will satisfactorily resolve the classification issue.

Single copies of GAO reports are available free of charge. Requests (except by Members of Congress) for additional quantities should be accompanied by payment of \$1.00 per copy.

Requests for single copies (without charge) should be sent to:

U.S. General Accounting Office
Distribution Section, Room 1518
441 G Street, NW.
Washington, DC 20548

Requests for multiple copies should be sent with checks or money orders to:

U.S. General Accounting Office
Distribution Section
P.O. Box 1020
Washington, DC 20013

Checks or money orders should be made payable to the U.S. General Accounting Office. NOTE: Stamps or Superintendent of Documents coupons will not be accepted.

PLEASE DO NOT SEND CASH

To expedite filling your order, use the report number and date in the lower right corner of the front cover.

GAO reports are now available on microfiche. If such copies will meet your needs, be sure to specify that you want microfiche copies.

AN EQUAL OPPORTUNITY EMPLOYER

**UNITED STATES
GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548**

**OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300**

**POSTAGE AND FEES PAID
U. S. GENERAL ACCOUNTING OFFICE**



THIRD CLASS