

CLASSIFICATION APPEAL DECISION

issued by:

U.S. DEPARTMENT OF THE INTERIOR

Washington, D.C. 20240

APPELLANT:

[REDACTED]

POSITION:

Supervisory Range Technician, GS-455-7

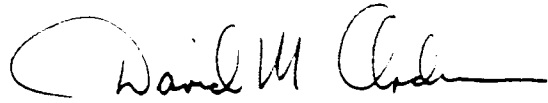
ORGANIZATION:

Department of the Interior
Bureau of Land Management
Montana State Office

[REDACTED]
[REDACTED]
[REDACTED]

DECISION:

Supervisory Range Technician, GS-455-8
(Appeal granted, position upgraded)



David M. Anderson
Office of Personnel Policy

APR 28 1999

DATE

Copy of Decision Transmitted to:

[REDACTED]

Connie Stewart, Personnel Officer
Bureau of Land Management

Diane M. Friez, Personnel Officer
Montana State Office, BLM

INTRODUCTION

On January 5, 1999, [REDACTED] appealed the classification of his position to the Director of Personnel Policy, Department of the Interior. [REDACTED] is employed as a Supervisory Range Technician, GS-455-7, in the Bureau of Land Management, Montana State Office, [REDACTED]. He has appealed for reclassification of his position to a higher grade because he states that his current duties are at a higher level than GS-7.

[REDACTED] has also requested that GS-9 be re-established as the target grade of his position. He states that when his position was advertised and he was selected at the GS-7 level, the career ladder was identified as GS-7/8/9. Subsequently, the servicing personnel office identified the full performance level of the position as GS-7.

This is the final administrative decision within the Department of the Interior. This decision is based on the appellant's current duties and does not consider projected duties that he may be performing at some future date. Therefore, it establishes only the current classification of the position and does not attempt to establish the target or highest grade to which the appellant may be promoted.

SOURCES OF INFORMATION

In deciding this appeal, we considered information from the following sources:

1. The appellant's letter of appeal and attachments, including a copy (without the signed and certified OF-8 cover page) of his position description (which differs in minor ways from his official position description); certifications of accuracy of the position description signed by the appellant and his supervisor, [REDACTED] (Chief Division of Fire Management); evaluation statement for the position from the servicing personnel office; and the appellant's discussion about why he believes the evaluation is not correct. On February 22, 1999, the appellant submitted an additional statement about his appeal and a standard position description and evaluation for fire helicopter crew supervisors issued in 1996 by the BLM Office of Fire and Aviation. At the time of the audit, he submitted a summary of 1998 activity for his crew and the Zone Aviation Operations Plan.
2. The material submitted by the Bureau of Land Management on February 10, 1999, including the current position description and evaluation statement, Notification of Personnel Action (SF-50), the appellant's current performance plan, organization chart for the [REDACTED] functional statement for the Division of Fire Management, position descriptions for the Fire Management Officer and for the Fire Program Specialist (Operations), and evaluation statements for other Range Technician and Supervisory Range Technician positions. The servicing personnel office later submitted the position descriptions and evaluation statements for the Montana State Aviation Manager and for the appellant's subordinates.
3. Telephone audit of the appellant's position on April 1, 2, 9, and 16, 1999, and telephone

interviews with [REDACTED] on April 1 and 9.

POSITION INFORMATION

The appellant serves as fire and helicopter (helitack) crew supervisor and as the Zone Aviation Officer for the [REDACTED] Field Office. (In this decision, the terms "Zone" and "field area" refer to the area served by the [REDACTED] Field Office.) His helicopter crew supervisor duties include the following:

During initial attack, ongoing fires, other natural disasters, search and rescue, and other emergencies, serves as helicopter manager, crew boss, and helibase manager. Responses can occur in the Zone or on an inter-agency basis in support of other agency efforts. Manages complex helicopter operations, utilizing different helicopter models with varying capabilities, and provides pilots, crews, and dispatchers with detailed instructions on incident objectives, situations, and tactics. Determines incident needs, orders personnel, equipment and supplies, and directs and monitors initial incident activities.

Is responsible for helicopter safety and compliance with applicable policies and procedures. Ensures subordinates are trained and qualified to perform missions safely and efficiently, and that all flight policies and procedures are followed. Is certified to operate, maintain, inspect, and service a wide range of accessory equipment, such as the helitorch, Premo Mark III Plastic Sphere Dispensers, medivac equipment, longline/remote hooks, and infrared detection equipment. Monitors and tracks flight and/or duty hours of pilots, mechanics, and fuel truck drivers to ensure that hour limitations are not exceeded.

During the fire season, exercises the full range of supervisory duties for a work force of six seasonal employees and additional employees on an as-needed basis. Provides supervision to pilots, mechanics, and fuel truck drivers.

The Zone Aviation Officer duties include the following:

Plans, drafts recommendations, provides guidance, and implements field area aviation support for natural resource goals and objectives. Implements aviation systems, technical standards, criteria and guides in aviation safety, air operations training, aircraft procurement/utilization, and contract compliance. Ensures that Office of Aircraft Services, Bureau, Departmental, and Federal Aviation Administration regulations are followed in aviation management and safety. Develops and implements aviation plans for projects requiring aviation support.

Annually reviews, updates, and submits aviation operational plan and use summaries to the State Office. Assists in the preparation of operating guidelines and specifications for contracts for the use of aircraft during fire emergencies.

Serves as the focal point for aviation safety and ensures that all aircraft and pilots used by the

Field Office are approved by OAS and capable of performing mission requirements safely. Investigates minor, non-damaging aircraft incidents, evaluating regulatory compliance and ensuring necessary preventive measures are implemented. Prepares reports specifying causes of incidents and recommends corrective action. Conducts aviation safety training for rotor and fixed-wing aircraft.

SERIES AND TITLE DETERMINATION

The appellant's supervisory helitack duties are correctly placed in the Range Technician Series, GS-455, which includes positions that primarily require a practical knowledge of the methods and techniques of range conservation and related resource management fields. Range technicians provide practical technical support in range research efforts; in the marketing of the range resource; and in the scientific management, protection, and development of grasslands and other range resources. Although the supervisory helitack duties require knowledge in areas other than those typical of range technician, including knowledge of fire suppression and of aircraft capabilities, the appellant's fire control duties require knowledge of Bureau programs, including fire management. Reference to the standard for the Fire Protection and Prevention Series, GS-081, confirms the series placement in the GS-455 series. The exclusions section of the GS-081 standard states that positions involving fire control and suppression activities incidental to range management, as is the case with the appellant's position, should be classified in the GS-455 series. The prescribed title for supervisory positions in the GS-455 series is Supervisory Range Technician.

The appellant's nonsupervisory work as Zone Aviation Officer requires a variety of knowledges, including range conservation, report preparation, aviation, and safety and contract compliance support. These functions are analogous to work described in the Transportation Group, GS-2100, which includes all classes of positions which advise on, administer, or perform work involved in the provision of transportation services to the Government, as well as other transportation related work.

The most appropriate series for the Zone Aviation Officer duties within the Transportation Group is the Transportation Clerk and Assistant Series, GS-2102, which includes positions that arrange transportation for or perform other actions in connection with the movement of freight by Government or commercial means. The 2102 series also includes other transportation support work not covered specifically by another one-grade interval series in the Transportation Group. The work in this series requires a practical knowledge of the regulations and methods governing traffic management or transportation programs. The paramount knowledge requirement of the appellant's Aviation Officer work is a practical knowledge of the regulations, purposes, procedures, guidelines, and methods of the Bureau's aviation program, and the main purpose of the work is to support the aviation program for the Field Office. In addition, the classification standard for the GS-2102 series covers most of the major elements of the appellant's work, including report analysis and preparation, safety and regulatory program support, and performance reviews and quality inspections of services provided under contract. Thus, the

appellant's Zone Aviation Officer duties correspond to those in the GS-2102 series.

The appellant's supervisory helitack duties and Zone Aviation Officer duties are evaluated at the same grade level, as discussed below; therefore, the series placement of the position is not determined on the basis of the grade-controlling duties. The paramount knowledges required and the sources of recruitment for the position both indicate that the position should be placed in the GS-455 series. Recruitment for both types of work is from similar sources, i.e., those in the range conservation program who have knowledge of fire suppression and control and of the Bureau's aviation program. In addition, the function of the Field Office and of the Division of Fire Management suggests that the GS-455 series is appropriate for the position. Therefore, we conclude that the Range Technician Series, GS-455, is appropriate for classification of the position.

GRADE DETERMINATION

The appellant supervises six seasonal employees who are employed as range technicians or range aids during the fire season. In addition, he exercises a degree of supervisory control over contract employees and over employees from other offices in BLM or from the Forest Service or the Fish and Wildlife Service who work on the prescribed burn program during the early spring and the fall or who supplement the workforce as needed during the fire season. Supervisory duties are evaluated by reference to the General Schedule Supervisory Guide (GSSG).

In order for a position to be considered a supervisor for classification purposes, i.e., so that the GSSG may be used to grade the supervisory work, it must meet certain criteria. These criteria include: accomplishing work through combined technical and administrative direction of others; performing certain supervisory duties described under Factor 3 in the GSSG; and spending at least 25 percent of the work time performing the supervisory duties. The appellant's supervisory duties meet the first two of these three criteria and, according to the position description, he spends 40 percent of his work time on supervisory duties. The appellant and his supervisor confirm the 40 percent figure.

We conclude that the appellant spends at least 25 percent of his time performing supervisory work. He spends approximately 80 percent of his time on supervisory duties during the fire season, which runs approximately four months per year, or the equivalent of about 3.2 months per year. An estimate of 80 percent of a position's time spent on supervision of six employees would normally be considered high. However, because the appellant's employees are low grade employees who perform work that requires close supervision because of the critical nature of their work, and because he must spend substantial amounts of time training them as seasonal employees, the 80 percent figure is reasonable. The other 20 percent of his work time during the fire season is mainly spent performing nonsupervisory fire control work. Because the appellant is a career seasonal employee, he works approximately 11 months each year. The 3.2 months of supervisory work is about 29 percent of his work year of 11 months. This percentage is sufficient for meeting the major duty criterion (25 percent of the work time) in the GSSG. His

supervision of other employees on an incidental basis in the fire season and during the prescribed burn seasons fails to meet the minimum criteria under Factor 3 (as discussed below) and is therefore not covered by the GSSG. (The supervision of contract employees is not considered in determinations of GSSG coverage, regardless of whether it meets the Factor 3 criteria.) This percentage (29%) provides a reasonable cushion over the 25 percent minimum to cover the appellant's occasional performance of other duties, such as Zone Aviation Officer work, even during the fire season. Therefore, the grade of the supervisory duties is determined by application of the GSSG.

The GSSG provides evaluation criteria for determining the General Schedule grade level of supervisory positions. The GSSG uses a point-factor evaluation method with six factors designed specifically for supervisory positions. A point value is assigned to each factor based on a comparison of the position's duties with the factor-level definitions. If a position exceeds one level but does not meet the next higher level, the lower level must be credited.

The servicing personnel office has evaluated the appellant's supervisory duties at the GS-7 level. The appellant disagrees with the personnel office's evaluation of Factor 6, as discussed below, and contends that his supervisory duties should be evaluated at the GS-8 level.

Factor 1, Program Scope and Effect

This factor assesses the general complexity, breadth, and impact of the program areas and work directed, including the organizational and geographic coverage. It also assesses the impact of the work both within and outside the immediate organization. The criteria for both scope and effect must be met in order for a factor level to be credited.

a. Scope

This element addresses the general complexity and breadth of (1) the program or program segment directed, and (2) the work directed, the products produced, or the services delivered. The geographic and organizational coverage of the program within the agency structure is included under scope.

At Level 1-1, the work directed is procedural, routine, and typically provides services or products to specific persons or small, local organizations. The illustration in the GSSG for Level 1-1 assignments describes a position that directs messenger, guard, clerical, or laboratory support work below GS-5 in performing work that provides local services to an organizational unit, small field office, or comparable activity. The work directed by the appellant is routine, consistent with this level, although the scope of his work exceeds the purely local designation for delivery of the services, as the field area covers 22 counties and approximately 3.7 million acres. The work he supervises is primarily at the GS-4 level, consistent with the illustration of work below GS-5.

At Level 1-2, the program segment or work directed is administrative, technical, complex clerical, or comparable in nature. The functions, activities, or services provided have limited geographic coverage and support most of the activities comprising a typical agency field office, an area office, a small to medium military installation, or comparable activities within agency program segments. The work directed by the appellant does not match the complexity described at Level 1-2. Although the GS-4 employees he supervises are titled Range Technician, the work they perform is of a routine nature, as described at Level 1-1, and not complex clerical or technical. The work of his unit matches the geographic coverage found at Level 1-2, because of the size of the area covered by the Field Office, but the work does not support most of the activities of the Field Office. Instead, his work primarily supports the activities of a portion of the Field Office, i.e., the Division of Fire Management. Support for most of the Field Office activities is creditable to positions at a higher level than the appellant. Therefore, Level 1-2 is not credited for scope.

b. Effect

This element addresses the impact of the work and/or the programs described under scope on the mission and programs of the customer, the activity, other activities in or out of Government, the agency, other agencies, the general public, or others.

At Level 1-1, the work directed facilitates the work of others in the immediate organizational unit, responds to specific requests or needs of individuals, or affects only localized functions. The work supervised by the appellant meets this level, in that it facilitates the work of the Division.

At Level 1-2, the services or products support and significantly affect installation level, area office level, or field office operations and objectives, or comparable program segments; or provide services to a moderate, local or limited population of clients or users comparable to a major portion of a small city or rural county. The services provided by the appellant's unit primarily support the Division and do not significantly affect the Field Office operations. Although fires can affect all of the Field Office's functions, the primary focus of the position is on field area helitack operations. The appellant's unit also does not provide services to a population of clients comparable to a major portion of a small city or rural county. While some of the appellant's fire work affects land controlled by other Federal or state agencies, as well as private landowners, the appellant does not direct a program segment that routinely provides services to the type of population described at this level. Therefore, effect is not evaluated at Level 1-2.

In summary, both the scope and the effect of the appellant's position are evaluated at Level 1-1. Therefore, this factor is evaluated at Level 1-1.

Level 1-1

175 points

Factor 2, Organizational Setting

This factor considers the organizational situation of the supervisory position in relation to higher levels of management.

At Level 2-1, the position is accountable to a position that is two or more levels below the first (i.e., lowest in the chain of command) SES, equivalent or higher level position in the direct supervisory chain. The appellant reports to the Fire Management Officer, who is two levels below the Montana State Director, which is the first SES position over the appellant's function. Therefore, Level 2-1 is credited.

Level 2-1

100 points

Factor 3, Supervisory and Managerial Authority Exercised

This factor covers the delegated supervisory and managerial authorities which are exercised on a recurring basis. To be credited with a level under this factor, a position must meet the authorities and responsibilities to the extent described for the specific level.

At Level 3-2c, the supervisor must carry out at least three of the first four, and a total of six or more, of ten authorities and responsibilities. In abbreviated form, they are as follows: (1) plan work to be accomplished by subordinates, set priorities, and prepare schedules for work completion; (2) assign work; (3) evaluate work performance; (4) give advice, counsel, or instruction on both work and administrative matters; (5) interview candidates and recommend personnel actions; (6) hear and resolve employee complaints; (7) effect minor disciplinary measures and recommend others; (8) identify developmental needs and provide or arrange for training; (9) find ways to improve production and work quality; (10) develop performance standards.

With respect to the six seasonal employees assigned to him, the appellant carries out all of the first four responsibilities, and all of the remaining six responsibilities, except for effecting minor disciplinary measures. Although his position description states that he has responsibility for such disciplinary actions, in practice such actions have been taken by his supervisor. With respect to the employees the appellant directs on an incidental basis during the fire season or during prescribed burn activities, he carries out some of the same supervisory responsibilities as for his six seasonal employees. Exceptions are as follows: evaluating work performance (although he does provide a brief report of the employees' work for use by their agency in evaluating their performance), interviewing candidates for positions in his unit, identifying training needs, and developing performance standards. Thus, he carries out only five of the ten responsibilities for the employees he supervises on a project or incidental basis. Therefore, the supervisory authorities and responsibilities assigned to the appellant meet Level 3-2 for the seasonal employees assigned to him, but not for the other employees briefly under his supervision. His supervision of contract employees also does not meet Level 3-2.

At Level 3-3a, supervisors exercise delegated managerial authority to set a series of annual, multi-year, or similar types of long-range work plans and schedules for in-service or contracted work. Supervisors at this level assure implementation of the goals and objectives for the program segments or functions they oversee. These positions are closely involved with high-level program officials in the development of overall goals and objectives for assigned staff functions, programs, or program segments. Level 3-3a is a managerial level that considerably exceeds the authorities delegated to the appellant.

At Level 3-3b, supervisors exercise at least eight of 15 delegated supervisory authorities described in the GSSG. These authorities include such aspects as supervision of subordinate supervisors and multiple groups, units, and projects or direction of a major program or program segment (e.g., one with a multimillion dollar budget). The appellant is a first-level supervisor; therefore, his supervisory responsibilities are not comparable to those described at Level 3-3b.

Level 3-2

450 points

Factor 4, Personal Contacts

This is a two-part factor which assesses the nature and purpose of personal contacts related to supervisory and managerial responsibilities. The same contacts that serve as the basis for the level credited under Subfactor 4A must be used to determine the correct level under Subfactor 4B.

Subfactor 4A, Nature of Contacts

This subfactor covers the organizational relationships, authority, or influence level, setting and difficulty of preparation associated with making personal contacts involved in supervisory and managerial work.

Level 4A-2 may be credited for frequent contacts comparable to any of several types listed in the GSSG. One of those listed is contacts with higher ranking managers, supervisors, and staff of program, administrative, and other work units and activities throughout the field activity or major organization level of the agency. Contacts at this level also include those with technical or operating level employees of state or local governments. Comparable contacts would include those with employees of other Federal agencies.

In addition to contacts within the Division, the appellant has contacts with higher-level staff members in other BLM organizations, such as the State Aviation Manager and staff at the Office of Aircraft Services. He also has contacts with employees of the companies which furnish staff and equipment for the fire control program and with staff from other Federal agencies, including the Fish and Wildlife Service and the Forest Service, and with staff from state agencies. These contacts meet Level 4A-2. At Level 4A-3, contacts are with high-level officials of Federal agencies, key staff of public interest groups, journalists, congressional committee staff members,

high-level contracting officials of large firms, and local officers of trade associations. The appellant does not have such contacts in connection with his supervisory work on a recurring basis.

Level 4A-2

50 points

Subfactor 4B, Purpose of Contacts

This subfactor covers the purpose of the personal contacts credited in Subfactor 4A, including the advisory, representational, negotiating, and commitment-making responsibilities related to supervision and management.

At Level 4B-2, the purpose of contacts is to ensure that information provided to outside parties is accurate and consistent; to plan and coordinate the work directed with that of others outside the subordinate organization; and/or to resolve differences of opinion among managers, supervisors, employees, contractors, or others. The appellant's contacts with employees of other Federal and state agencies are to coordinate the work of his employees with the work of those contacted, for example, regarding their participation in fire operations. His contacts with employees of contract companies are to plan work and, occasionally, to resolve problems. These contacts are consistent with Level 4B-2.

At Level 4B-3, the purpose of contacts is to justify, defend, or negotiate in representing the project, program segment, or organizational unit directed, in obtaining or committing resources, and in gaining compliance with established policies, regulations, or contracts. Contacts at this level usually involve active participation in conferences, meetings, hearings, or presentations involving problems or issues of considerable consequence or importance to the program or program segment directed. The appellant's contacts are not of this level. He is not called upon to justify or negotiate matters concerning his unit, especially in conferences, meetings, or hearings.

Level 4B-2

75 points

Factor 5, Difficulty of Typical Work Directed

This factor measures the difficulty and complexity of the basic work most typical of the organization directed, as well as other line, staff, or contracted work for which the supervisor has technical or oversight responsibility, either directly or through subordinate supervisors, team leaders, or others.

The appellant supervises six seasonal employees whose grades may vary to some extent from year to year. In 1999, the positions of five of his employees are classified as Range Technicians, GS-455-4, and one is a Range Aid, GS-455-3. Although some GS-5 crew leaders may

occasionally work under projects under the appellant's direction, he does not serve as a supervisor over these employees for the reasons discussed above under Factor 3. The work performed by the GS-4 employees best characterizes the nature of the basic work that the appellant oversees and it constitutes more than 25 percent of the appellant's supervisory workload. Therefore, GS-4 is the base level of the work supervised, and the factor level credited is 5-2.

Level 5-2

205 points

Factor 6. Other Conditions

This factor measures the extent to which various conditions contribute to the difficulty and complexity of carrying out supervisory duties, authorities, and responsibilities. The servicing personnel office has credited Level 6-1, but the appellant contends that his position should be evaluated at Level 6-2.

At Level 6-1, the work supervised involves clerical, technician, or other work comparable in difficulty to the GS-6 level or lower. This may vary from basic supervision over a stable workforce performing work operations that are routine, to a level of supervision which requires coordination within the unit to ensure that timeliness, form, procedure, accuracy, quality, and quantity standards are met in individual cases. The appellant supervises work at the GS-4 level that is consistent with Level 6-1.

At Level 6-2, the work supervised involves technician and/or support work at GS-7 or GS-8. This level may also be credited when the supervisor has full and final technical authority over work at the GS-4, 5, or 6 level. Full and final technical authority means that the supervisor is responsible for all technical determinations arising from the work, without technical advice or assistance on even the more difficult and unusual problems, and without further review except from an administrative or program evaluation standpoint. Credit for this aspect should be limited to situations involving an extraordinary degree of finality in technical decision making.

The appellant has no subordinate employees above the GS-4 level. He is responsible for the unit's operation but does not have an extraordinary degree of finality in technical decision making. His supervisor is knowledgeable about the unit's operations and services, and it is not the case that the appellant makes all technical determinations about the unit without advice or assistance on even the most difficult problems.

Level 6-2 may also be credited when the position directs subordinate supervisors of work comparable to GS-6 or lower, and when coordinating the work of the subordinate units requires a continuing effort to assure quality and service standards. The appellant does not direct subordinate supervisors.

The GSSG directs that, if the level selected for this factor is either 6-1, 6-2, or 6-3, the position is

to be evaluated one level higher if it meets three or more of the eight Special Situations listed in the GSSG. The servicing personnel office has credited the appellant's position with one of the situations--special hazard and safety conditions. The appellant contends that his position should also be credited with fluctuating work force/constantly changing deadlines and with physical dispersion.

Special Situations

1. Variety of Work

Variety is credited when more than one kind of work, usually equivalent to a classification series, is present in the work of the unit. All of the appellant's employees are classified in the GS-455 series and they all perform the same kind of work. Therefore, this situation is not credited.

2. Shift Operations

This situation is credited when the position supervises an operation carried out on at least two fully staffed shifts. The appellant does not supervise shift operations. Therefore, this situation is not credited.

3. Fluctuating Work Force or Constantly Changing Deadlines

Fluctuating work force is credited when the workforce supervised has large fluctuations in size (e.g., when there are significant seasonal variations in staff) and these fluctuations impose on the supervisor a substantially greater responsibility for training, adjusting assignments, or maintaining a smooth flow of work while absorbing and releasing employees. Constantly changing deadlines may be credited when frequent, abrupt, and unexpected changes in work assignments, goals, and deadlines require the supervisor constantly to adjust operations under the pressure of continuously changing and unpredictable conditions.

In its evaluation of the position, the servicing personnel office did not credit this situation and discussed the rationale for this decision in terms of an article in the OPM Digest of Significant Classification Decisions and Opinions, issue number 20. The introduction to the Digest states, "The Digest is designed to aid classifiers in exercising their judgment; Digest items do not supersede or supplement classification standards and do not constitute 'case law.'" The referenced article provides an exhaustive treatment of the rationale for deciding whether to credit special situations. However, we note that the article discusses special situations with respect to a position that bears little resemblance to the appellant's; the position is a second-level supervisor in charge of a telephone service center. Also, the servicing personnel office's evaluation denied credit for fluctuating work force because the seasonal variations in the appellant's workforce are not "unpredictable, frequent, and abrupt." We note that the GSSG discusses frequent, abrupt, and unexpected changes in terms of constantly changing deadlines, not in terms of fluctuating work force.

The appellant's workforce expands from zero to six and back to zero each year due to seasonal demands for staff. In addition, some of the appellant's employees are students who may arrive after the first fires or depart before the last fires of the season. These circumstances match the criterion in the standard, i.e., large fluctuations in staff size due, e.g., to significant seasonal variations. In order for fluctuating work force to be credited, these variations must impose on the appellant substantially greater supervisory demands, including a substantially greater responsibility for training or adjusting assignments or maintaining a smooth flow of work while absorbing and releasing employees. A review of the summary of activity for the Lewistown helitack crew for the 1998 fire season indicates that such conditions exist. The fire season began early, before some members of the crew had received appropriate training. Substantial training was conducted in June, consistent with BLM policy that requires substantial amounts of both classroom and field training for helitack crew members. Crew members continued to be assigned to various types of fires and incidents depending on what training they needed. Training continued into August. These types of circumstances are consistent with the criterion of substantially greater responsibility for training and for adjusting assignments due to seasonal variations in staff. These demands on the appellant's position substantially exceed the authorities credited in Factor 3 for identifying developmental and training needs of employees and providing or arranging for needed development and training, as well as for planning, scheduling, and assigning work. Therefore, credit is warranted for fluctuating work force.

The 1998 activity report for the helitack crew and other information about the position also support granting credit for constantly changing deadlines. The nature of fire work requires the appellant constantly to adjust the operations of his unit due to continuously changing and unpredictable conditions, including the weather and the number, location, and character of fires. Also, he and his crew are frequently subject to emergency call-up and mobilization to fires in other parts of the country. When they are diverted to fires in other areas, he must adjust operations for fires that then occur in the field area. The changes in work assignments, goals, and deadlines are frequent, abrupt, and unexpected. Therefore, credit is warranted for constantly changing deadlines. The GSSG provides for Situation 3 to be credited as one situation even though both fluctuating work force and constantly changing deadlines are credited.

4. Physical Dispersion

This situation is credited when a substantial portion of the workload for which the supervisor is responsible is regularly carried out at one or more locations which are physically removed from the main unit under conditions which make day-to-day supervision difficult to administer. The servicing personnel office did not credit this situation, again by citing Digest articles, one of which describes the second-level supervisory position mentioned above that, as noted, bears little resemblance to the appellant's position. The other article cited, in Digest issue number 21, describes a Federal Wage System second-level supervisory job graded by application of the Job Grading Standard for Supervisors (WS). The discussion of this job is not pertinent to classification of the appellant's position.

The appellant contends that physical dispersion should be credited. He requests credit for this situation, in part, because his crew members are sometimes assigned to fires in other areas. In some cases, the appellant travels with his crew and stays with them. If he is not with them, they are usually under the direction of others in charge of the fires in that location. These types of circumstances are not creditable as physical dispersion. However, the appellant's crew members are frequently sent to work on multiple fires, as approximately one third of the fire days in the field area involve multiple fires. In such situations, the appellant assigns crew members in more than one location at a time. In addition, he is not always with his crew even when they are all working on one fire because he must be in other locations, such as with the helicopter refueling operation. The appellant's employees require close direction because of the nature of their work and the circumstances of fire control in the context of range conservation. Thus, the physical dispersion of his employees makes supervision difficult for the appellant to administer. This situation is credited.

5. Special Staffing Situations

This situation is credited when (1) a substantial portion of the workload is involved in special employment programs; or in similar situations which require involvement with employee representatives to resolve difficult or complex human resources management issues and problems; (2) requirements for counseling and motivational activities are regular and recurring; and (3) job assignments, work tasks, working conditions, and/or training must be tailored to fit the special circumstances. The appellant does not supervise employees involved in special employment programs, and his employees do not require the types of counseling and assignments described in this situation.

6. Impact of Specialized Programs

This situation is credited when supervisors are responsible for a significant technical or administrative workload in grades above the level of work credited in Factor 5. The appellant does not supervise any employees above the GS-4 level. Therefore, this situation is not credited.

7. Changing Technology

This situation is credited when work processes and procedures vary constantly because of the impact of changing technology, creating a requirement for extensive training and guidance of the subordinate staff. The appellant is not called upon to exercise extensive training and guidance due to changing technology. This situation is not credited.

8. Special Hazard and Safety Conditions

This situation is credited when the supervisory position is regularly made more difficult by the need to make provision for significant unsafe or hazardous conditions occurring during performance of the work of the organization. The appellant must make provisions for significant

unsafe and hazardous conditions due to the unpredictable nature of range fires and the inherent danger of fire control, and due to the danger involved in helicopter operations, particularly in rugged terrain. This situation is credited.

Because three situations are credited, in addition to Level 6-1, Level 6-2 is credited.

Level 6-2 575 points

Factor Summary for Supervisory Duties

| <u>Factor</u> | <u>Level</u> | <u>Points</u> |
|--|--------------|---------------|
| 1 Program Scope and Effect | 1-1 | 175 |
| 2 Organizational Setting | 2-1 | 100 |
| 3 Supervisory and Managerial Authority Exercised | 3-2 | 450 |
| 4 Personal Contacts | | |
| 4A Nature of Contacts | 4A-2 | 50 |
| 4B Purpose of Contacts | 4B-2 | 75 |
| 5 Difficulty of Typical Work Directed | 5-2 | 205 |
| 6 Other Conditions | 6-2 | <u>575</u> |
| | Total | 1630 |

The total number of points credited, 1630, falls within the range for GS-8 (1605-1850) according to the point-to-grade conversion chart in the GSSG. Therefore, the appellant's supervisory duties are evaluated at the GS-8 level.

The nonsupervisory Zone Aviation Officer duties are graded by application of the classification standard for the Transportation Clerk and Assistant Series, GS-2102. The standard is written in the Factor Evaluation System (FES) format. Under the FES, positions are placed in grades on the basis of their duties, responsibilities, and qualifications required as evaluated in terms of nine factors common to nonsupervisory General Schedule positions.

A point value is assigned to each factor based on a comparison of the position's duties with the factor-level descriptions. The factor point values mark the lower end of the ranges for the indicated factor levels. For a position factor to warrant a given point value, it must be fully equivalent to the overall intent of the selected factor-level description. If the position fails in any significant aspect to meet a particular factor-level description in the standard, the lower point value must be assigned.

The appellant contends that his nonsupervisory duties should be graded at the GS-9 level. He disagrees with several of the factors credited by the servicing personnel, but that evaluation is not

based on the Zone Aviation Officer duties.

The Primary Standard is used to evaluate factors for which the appellant's work may exceed the highest level described in the GS-2102 standard. Factor level determinations based on the Primary Standard should be confirmed by reference to another standard that covers work related to the appellant's position. The most appropriate ones for this purpose are the standards for the Purchasing Series, GS-1105, and the Grade Level Guide for Aid and Technician Work in the Biological Sciences (Guide), which is used to grade range technician work.

The Purchasing Series includes positions that perform work to acquire supplies, services, and construction by purchase, rental, or lease through delivery orders or small purchase procedures. The work requires knowledge of policies and procedures for delivery orders and small purchases and also requires knowledge of commercial supply sources and common business practices. Purchasing work is technician work that is related to the appellant's responsibility in contract support. (The standard for the Procurement Clerical and Technician Series, GS-1106, might seem to be more appropriate than the standard for the GS-1105 series, but the GS-1106 standard does not include factor level descriptions at higher levels than those in the GS-2102 standard.)

The Guide provides general criteria for use in determining the proper grade level of nonsupervisory and nonleader aid and technician positions that are concerned with supporting work efforts related to the biological sciences. The Guide covers technician work that is similar to that performed by the appellant and that is related to the organizational function of the Division of Fire Management.

For confirmation of Primary Standard factor levels that are not described in any of these technician standards, reference is made to the standard for the Traffic Management Series, GS-2130, which includes positions that involve (1) performing technical and analytical work concerned with planning, development, and execution of traffic policies and programs; or (2) directing and managing programs to obtain the economical and efficient transportation of freight, personal property, and/or passengers. This series covers two-grade interval administrative work. Comparisons of technician work with a standard for an administrative occupation are made only in the absence of comparable standards that describe one-grade interval technician work.

Factor 1, Knowledge Required by the Position

At Level 1-4, as described in the GS-2102 standard, the work requires knowledge of an extensive body of transportation regulations, methods, and practices to perform a wide variety of interrelated or nonstandard transportation support assignments and resolve a wide range of problems. The appellant's work requires knowledge and application of an extensive body of Bureau and Departmental regulations, as well as some knowledge of FAA regulations. He must also have knowledge of a wide variety of methods and practices regarding aircraft use in the Zone. This type of knowledge meets Level 1-4.

The work at Level 1-4 requires knowledge comparable to one or more of several examples listed in the standard. Although the examples are not precise matches for the type of aviation program work that the appellant performs, they all describe extensive knowledge of regulations used to carry out a wide variety of assignments, including nonrecurring and nonstandard assignments. One of the examples is comparable to the appellant's assignments:

-- Knowledge of the requirements of various transportation regulations or operations to monitor and report on carrier compliance with contract terms, safety provisions, or other transportation programs. This work typically involves knowledge of report preparation and skill in analyzing factual information to document deficiencies or areas of noncompliance and make recommendations for action.

This example is similar to the requirements of the appellant's position for knowledge of Bureau and Departmental regulations and operations for aircraft use, including contract matters and safety provisions, as well as his responsibility for data collection, analysis, and report preparation. However, the next higher level must be explored because Level 1-4 does not fully capture his responsibility for integrating the various aspects of the Zone's aviation program and for making recommendations regarding the conduct of the program. The Level 1-4 example describes primarily a review and reporting function without the degree of decision-making responsibility found in the appellant's position.

Level 1-4 is the highest level described in the GS-2102 standard. According to the Primary Standard, Level 1-4 requires practical knowledge of standard procedures in a technical field, requiring extended training or experience, to perform such work as adapting equipment when this requires considering the functioning characteristics of equipment; interpreting results of tests based on previous experience and observations; or extracting information from various sources when this requires considering the applicability of information and the characteristics and quality of the sources. In addition to the practical knowledge of standard procedures at Level 1-4, Level 1-5 requires practical knowledge of technical methods to perform assignments such as carrying out limited projects which involve the use of specialized complicated techniques. The appellant's work requires knowledge that is consistent with Level 1-5; i.e., work that requires knowledge of technical methods rather than simply knowledge of standard procedures, e.g., in extracting information. His work in support of contract and procurement, safety, and other aspects of the aviation program, including the requirement to integrate the various aspects of the assignments in his overall responsibility for the program, involves the use of specialized and complicated techniques.

According to the standard for the Purchasing Series, GS-1105, work at Level 1-5 requires knowledge of specialized technical purchasing methods and procedures to perform complex purchasing work. For example, work at this level involves duties such as the following: administering small purchases that require extensive monitoring and oversight to resolve complex problems (e.g., protests, claims, terminations, or substantial modifications), and coordinating/discussing these or similar problems with small purchase contractors and various

agency or activity personnel. The appellant is responsible for recognizing and resolving problems that arise in the aviation program in the Zone, including problems with contractor performance. He is responsible for dealing with contract employees and managers for problem resolution. This work is equivalent to Level 1-5 as described in the GS-1105 standard.

According to the GS-400 Guide, employees at Level 1-5 use knowledge of the technical methods and procedures related to the professional field(s) supported, of management practices, and of the agency's policy and programs to lay out, schedule, organize, and execute the details of either (1) a wide variety of types of limited operational projects incorporating diverse technical knowledges, e.g., limited projects requiring the application of appreciably dissimilar specialized methods, procedures and/or techniques; and/or (2) one-at-a-time (and often long-range) multi-phased projects, at least some of which have nonstandard technical problems that the technician must coordinate with others to resolve. The appellant's work involves a wide variety of operational projects involving aviation policy and procedures, safety training and assurance, and providing support for contracts in the aviation program. These projects require diverse technical knowledges and techniques and are carried out in support of the range conservation program in the Zone. He coordinates problem resolution with contract employees, Field Office managers, the State Aviation Manager, and staff of the Office of Aircraft Services. Therefore, the projects are consistent with Level 1-5. One of the illustrations of work at Level 1-5 may be compared to the appellant's work:

-- The technician schedules and executes a variety of responsible projects related to range conservation programs. For example, the technician plans and organizes a project for minimizing range trespass, subsequently oversees field action and prepares detailed reports and serves as the unit's witness in court on the facts, as required; develops preliminary plans for implementing improvements to grazing allotment when a variety of range revegetation methods of installation and other such factors are involved and oversees implementation; works with permittees in preparing preliminary designs and plans for a variety of standardized revegetation projects; and monitors the effectiveness of agency or contractor crews in performing a variety of unprecedented types of revegetation, construction, and other such projects, ensuring the technical adequacy of the completed work.

The appellant executes a variety of projects related to the aviation program, which supports the range conservation program, including developing and maintaining policy statements for the program, advising staff on the use of aircraft for fire control and other range projects, preparing reports on the Zone's aviation program, overseeing the safety compliance aspects of the program and carrying out the related training function, ensuring the certification of pilots and aircraft, and overseeing and monitoring the effectiveness of contractor aviation crews. This consistency with the Level 1-5 illustration further confirms the evaluation of the position at this level.

The Primary Standard describes Level 1-6 as requiring practical knowledge of a wide range of technical methods, principles, and practices similar to a narrow area of a professional field, and skill in applying this knowledge to such assignments as the design and planning of difficult, but

well-precedented projects. The appellant's work does not require knowledge at this level. Although he must have practical knowledge of a wide range of technical methods and practices, Level 1-6 requires both designing and planning projects in support of professional work. The appellant plans and oversees the support work for the Zone's aviation program, but is not responsible for project design.

Reference to the standard for the GS-1105 series confirms this conclusion. At Level 1-6, the work involves substantive involvement in multiple phases of work involving highly specialized services or manufactured equipment, including developing criteria for requirements, negotiating and awarding orders including those with nonstandard clauses, administering purchases of such specialized items and resolving complex problems. Work requiring specialized knowledge to perform such complex projects exceeds the knowledge requirements of the appellant's position. Similarly, Level 1-6 as described in the Guide requires knowledge of the technical methods and procedures, management practices, agency policies and programs, and an extensive familiarity with the methods and practices of the sciences or disciplines supported to (1) design, coordinate, and execute conventional projects, (2) participate responsibly with the scientist in most phases of the research process, or (3) administratively maintain a significant function or area of responsibility on an ongoing basis, e.g., ensuring proper day-to-day operation of an isolated field site, a small laboratory, or a significant multi-phased project or a discrete and ongoing technical function in a first level unit. The appellant's work does not require the level of technical knowledge to perform assignments comparable to those described at Level 1-6. As noted, his work does not involve project design or development, and his area of responsibility is not comparable to administration of a laboratory or field site. Therefore, Level 1-6 is not credited.

Level 1-5

750 points

Factor 2, Supervisory Controls

At Level 2-3, the supervisor or other designated authority outlines objectives, priorities, and deadlines and provides guidance on dealing with unusually involved or one-of-a-kind situations. Employees independently plan and carry out the successive steps to complete transportation support duties and use accepted practices to resolve problems and deviations. At this level, the supervisor or others review completed work for technical soundness, appropriateness, and conformity to policy and requirements. In some situations, work can be reviewed only after the fact in response to complaints from customers, carriers, or contractors. The methods the employee uses to complete assignments usually are not reviewed in detail.

The appellant works under the supervision of the Fire Management Officer, who assigns work in terms of general descriptions of the assignments, consistent with the objectives, priorities, and deadlines as described at Level 2-3. He generally plans and carries out his assignments independently, and they are reviewed by the supervisor and other management officials, as appropriate, for technical soundness and conformity to policy and requirements. The appellant's work that involves interaction with other individuals, such as training assignments and dealing

with contractors, other staff, and managers, is normally reviewed through customer comments. This level of supervisory controls meets Level 2-3.

Level 2-3 is the highest level described in the GS-2102 standard. At Level 2-4, as described in the Primary Standard, the supervisor sets the overall objectives and resources available. The employee and supervisor, in consultation, develop the deadlines, projects, and work to be done. The employee at this level is responsible for planning and carrying out the assignment, resolving most of the conflicts that arise, coordinating the work with others as necessary, and interpreting policy on his own initiative in terms of established objectives. Completed work is reviewed only from an overall standpoint in terms of feasibility, compatibility with other work, or effectiveness in meeting requirements or expected results.

The Fire Management Officer normally makes assignments with more specificity than is described at Level 2-4, i.e., including priorities and deadlines, as well as with guidance on assignments that have not been encountered before. The appellant carries out most of his day-to-day work with little guidance because of his familiarity with the problems that he encounters, but he does not normally interpret policy on his own initiative. His work is reviewed for technical soundness, rather than merely in terms of feasibility and compatibility with other work in the program, as would be required at Level 2-4. The standard for the GS-1105 series describes Supervisory Controls at Level 2-4 in the same terms as in the Primary Standard. The appellant's level of supervision received is closer than described at Level 2-4 in both the Primary Standard and the GS-1105 standard.

Level 2-3

275 points

Factor 3, Guidelines

At Level 3-3, guidelines are similar to those described at Level 3-2; i.e., numerous procedures for doing the work have been established, and many specific guidelines are used. Guidelines may include volumes of transportation regulations, manuals, guides, directories, and operating procedures. However, at Level 3-3, the guidelines are not applicable completely to many aspects of the work because of the problem solving or complicated nature of the assignments. For example, there may be no directly related precedent cases or reference to use in deciding whether justifications for a higher than normal level of service are valid. The appellant's guidelines include Bureau, Departmental, military, and FAA regulations and guides. These are general guidelines that do not cover many of the wide variety of operational problems that he encounters, particularly in the areas of safety and contract support.

At Level 3-3, employees use judgment to interpret guidelines, adapt procedures, decide approaches, and resolve specific problems. This may include reconciling incomplete and conflicting information when precedents or guidelines are not available or are not related directly. The appellant must exercise considerable judgment in interpreting guidelines. Because of the nature of the guidelines available for his use, he must frequently adapt procedures and

decide approaches, e.g., in evaluating safety aspects of aviation operations and compliance of pilots and their aircraft with safety and contract provisions. Thus, the nature of the guidelines and the judgment required to apply them meet Level 3-3.

Level 3-3 is the highest level described in the GS-2102 standard. The Primary Standard describes guidelines at Level 3-4 as including administrative policies and precedents that are applicable but stated in general terms. Guidelines for performing the work are scarce or of limited use. The employee at this level uses initiative and resourcefulness in deviating from traditional methods or researching trends and patterns to develop new methods, criteria, or proposed new policies. The guides available to the appellant, including Departmental and Bureau regulations, generally are administrative policies and precedents that may not cover in detail many of the problems that the appellant encounters. However, it would not be correct to characterize them as scarce or of limited use. In addition, in terms of the judgment required to apply them, the appellant only applies traditional methods and does not develop new methods, criteria, or new policies. He has developed the [REDACTED] Zone Operations Plan, but this document is derived from similar plans, and his work on the plan is not tantamount to the development of new policy. Such responsibility is carried out by management and not by the appellant.

Level 3-4 is not described in the GS-400 Guide or in the GS-1105 standard because this level is rarely found in technician positions. According to the standard for the Traffic Management Series, GS-2130, guidelines at Level 3-4 include agency traffic management policy statements and program directives, Government transportation regulations, and general administrative instructions. They provide a general outline of the program goals and objectives, but they do not detail the methods used to perform work assignments. The employee at this level uses initiative, extensive experience, and a broad knowledge of traffic management principles and industry practices to develop new methods and recommend changes. This reference confirms that the appellant's position should not be credited with Level 3-4. His guidelines are more specific than general agency policy and Government regulations, and he does not develop guidelines or methods.

Level 3-3

275 points

Factor 4, Complexity

At Level 4-3, the work involves performing one or more transportation support functions that require the use of different and unrelated procedures and methods. The use of different procedures may result because, for example, assignments are relatively broad and varied and may involve a full range of shipping or traveler situations, work methods are not completely standardized, or transactions are interrelated with other systems and often require extensive coordination with various, different personnel. The appellant's assignments are consistent with this level. He performs a transportation support function that requires the use of different and unrelated procedures and methods because of the variety of types of tasks that he must perform,

including those related to report preparation, and providing support in the areas of safety, contract compliance, and training. They involve the full range of aviation matters that arise in the Field Office. In addition, because he must deal with a variety of questions and problems, his work methods are not completely standardized. His work requires extensive coordination with multiple personnel who are concerned with various Bureau program areas because of the various uses of aviation in supporting the work of the Field Office.

At Level 4-3, employees identify the nature of the request, problem, or issue and determine the need for and obtain additional information through oral or written contacts and review of regulations and manuals. Employees may have to consider previous actions and understand how these actions differ from or are similar to the issue at hand before deciding on an approach. The appellant must deal with similar difficulties in identifying what needs to be done to complete his assignments. He considers precedent situations but then must decide what to do based on the facts at hand rather than merely by selecting actions based on previous cases, e.g., in assessing problems with safety or contract compliance.

At Level 4-3, employees make recommendations or take actions based on a case-by-case review of pertinent transportation regulations and documents, for example in reviewing requests for transportation of general cargo to determine the most appropriate shipping methods and actions required or reviewing requests for various specialized cargo (such as hazardous material) to determine appropriate shipping methods and coordinate with various personnel for handling, loading, and equipment. The appellant must take actions based on a case-by-case review because of the variety of types of uses of aircraft in the Zone and the different regulations that apply. The difficulty involved in his assignments is comparable to those cited at Level 4-3 in terms of the variety of elements that must be considered and analyzed in order to perform the work. Therefore, the complexity of the appellant's assignments meets Level 4-3 in terms of the nature of the work, the difficulty in identifying what needs to be done, and the difficulty and originality involved in performing the work.

Level 4-3 is the highest level described in the standard for the GS-2102 series. According to the Primary Standard, work at Level 4-4 typically includes varied duties requiring many different and unrelated processes and methods such as those relating to well-established aspects of an administrative or professional field. Decisions regarding what needs to be done include the assessment of unusual circumstances, variations in approach, and incomplete or conflicting data. The work at this level requires making many decisions concerning such things as the interpreting of considerable data, planning of the work, or refining the methods and techniques to be used. The complexity of the appellant's work does not meet Level 4-4. His assignments are not characteristic of an administrative or professional field, but rather are of a support nature. Although he must analyze a variety of issues and choose what to do from many possible courses of action, he does not have to deal with the assessment of unusual circumstances and of incomplete or conflicting data. In addition, while he must plan his assignments, he is not required to make many decisions based on large amounts of data or refining methods and techniques.

Level 4-4 is not described in the GS-1105 standard or in the Guide because this level is seldom found in technician positions. According to the GS-2130 standard, assignments at Level 4-4 typically consist of a variety of traffic management duties and projects involving many different and unrelated functions, processes, and methods that apply to established areas of transportation planning, operations, or management. For example, such assignments may include negotiating transportation fares, rates, and services; providing staff policy guidance and consultation to installations for a specific program area; advising on the transportation support requirements for a weapon system during the acquisition and operational phases; and planning and directing the traffic management program for a major field installation or regional area, including responsibility for advising program officials on all aspects of transportation operations and requirements, and developing operational plans and procedures for the economical and efficient movement of freight, passengers, and personal property. Work assignments at Level 4-4 require assessing issues or problems that are complicated by conflicting or incomplete data, unusual transportation requirements that involve considerable analysis to support, or the need to modify normal practices and techniques. The work requires making many decisions regarding, for example, the adequacy of data used to plan overall transportation requirements, and making authoritative interpretations of established transportation methods, techniques, and guidelines. All of these assignments and responsibilities clearly exceed the complexity of the appellant's position. For example, he does not conduct negotiations or advise others on policy matters, nor does he assess unusual program requirements that require him to modify aviation program practices. He does not direct a multi-faceted program for a regional office or comparable field area, and he is not responsible for any such program or staff advisory work. Therefore, Level 4-4 is not assigned.

Level 4-3

150 points

Factor 5, Scope and Effect

At Level 5-3, the purpose of the work is to apply conventional practices to treat a variety of problems in transportation transactions by applying established procedures. In terms of effect, the work results in recommendations, actions, or reports that affect the ability of serviced programs to conduct business adequately; e.g., the movement of equipment affects the ability of an agency or activity to conduct military exercises, training, or other activities. The work may also affect substantial costs incurred by the agency or activity, for example, in the selection of the most effective, efficient, and lawful handling of items or personnel, and ensuring the most advantageous costs to the agency.

The appellant applies conventional practices and procedures in carrying out a variety of types of fire and non-fire assignments for the Zone's aviation program. His work results in assistance to resource managers in the use of aircraft, affects how the resource programs are carried out, and results in the protection of life and property. Work of this purpose and effect is consistent with Level 5-3.

Level 5-3 is the highest level described in the GS-2102 standard. According to the Primary Standard, the work at Level 5-4 involves establishing criteria; formulating projects; assessing program effectiveness; or investigating or analyzing a variety of unusual conditions, problems, or questions. The work product or service affects a wide range of agency activities, major activities of industrial concerns, or the operation of other agencies. The appellant's work does not meet this level. He deals only with conventional problems, not with unusual problems, and he does not establish criteria in his area. In addition, his work affects the Zone's aviation program and related aspects of other programs in the Zone, but such effect is not tantamount to having an effect on a wide range of agency activities. The effect of his work on other agencies is incidental and not equivalent to the effect on their operation as contemplated at this Level.

Level 5-4 is not described in the GS-1105 standard or in the Guide because it is rarely found in technician positions. According to the standard for the GS-2130 series, the purpose of the work at Level 5-4 is to plan, develop, and implement traffic management projects or programs of considerable breadth and complexity. For example, employees at this level may negotiate with carriers for rates and services for major Government shippers, plan and manage an installation's program for transporting a wide range of commodities to destinations within the country and/or to ports of embarkation for overseas shipment, evaluate assigned traffic management functions and operations in a range of subordinate activities and installations, develop general policy and guidelines for an assigned area, and resolve complex problems where criteria and methods are not well-established. The results of the work at this level affect a range of agency activities being carried out at a number of locations. This description confirms that the appellant's work does not meet Level 5-4 in terms of either purpose or effect. He is not responsible for developing projects or managing programs such as those described, or for developing policy or resolving complex problems, and his work does not affect a wide range of Bureau activities at numerous locations. Therefore, Level 5-4 is not credited.

Level 5-3

150 points

Factor 6, Personal Contacts and Factor 7, Purpose of Contacts

Personal contacts at Level 2 are with employees in the same agency but outside the immediate organization, and may include personnel in other agencies. Contacts at this level also include members of the general public in a moderately structured setting and employees of transportation companies. The appellant has contacts with employees and managers in other organizations, including those throughout the Field Office and in OAS, and with the State Aviation Manager. His contacts also include employees of other agencies and of private companies. These contacts correspond to Level 2.

Personal contacts at Level 3 are not described in the GS-2102 standard. According to the Primary Standard, personal contacts at this level are with individuals or groups from outside the employing agency in a moderately unstructured setting and typically include persons in their capacities as attorneys, contractors, or representatives of professional organizations, the news

media, or public action groups. The appellant does not have such contacts. He deals with contract employees, but not with officials of contract companies as contemplated at Level 3 or in the unstructured setting required.

According to the Guide, contacts at Level 3 are made on a non-routine basis and may take place in a variety of settings. The role of each party is developed during the course of the meeting. Contacts are regularly established with (a) a variety of noted subject matter experts from other Federal agencies, universities, private foundations and professional societies; (b) influential local community leaders such as members of tribal governing bodies or comparable state or local government officials; (c) newspaper, radio, and television reporters; (d) legal representatives of private landowners; or (e) representatives of organized landowner or special interest groups. It is clear that the appellant does not have such contacts. Level 3 is not credited. The appellant's personal contacts are credited at Level 2.

The purpose of contacts at Level B is to plan and coordinate actions, and to prevent or correct errors, delays, or other complications from occurring. The appellant's contacts are to exchange information, provide advice, ensure compliance with aircraft operating procedures, coordinate aircraft use, and ensure adherence to safety regulations. Such contacts meet Level B.

Level C is not described in the GS-2102 standard. According to the Primary Standard, contacts at this level are to influence, motivate, interrogate, or control persons or groups. At this level the persons contacted may be fearful, skeptical, uncooperative, or dangerous. The appellant does not have contacts for such purposes, and most of his contacts are with individuals who are working toward mutual goals and who have cooperative attitudes.

According to the Guide, the purpose of contacts at Level C is to influence, motivate, interrogate, or control persons or groups. Such individuals are characteristically fearful, skeptical, or uncooperative, and skill must be used in the approach made to obtain the desired results. The appellant's contacts are not made for such purposes or with uncooperative individuals. Therefore, Level C is not credited. The appellant's purpose of contacts is credited at Level B.

Level 6-2/7-B

75 points

Factor 8. Physical Demands

At Level 8-2, the work requires above average physical agility, such as regular and recurring periods of prolonged standing, bending, stretching, and lifting. Most of the appellant's most strenuous duties are in connection with his supervisory duties, but he is frequently onsite for all types of aircraft operation, and he performs duties that are consistent with Level 8-2, including lifting, prolonged standing, and bending.

Level 8-3 is not described in the GS-2102 standard. The Primary Standard describes work at Level 8-3 as requiring considerable and strenuous physical exertion such as frequent climbing of

tall ladders, lifting heavy objects over 50 pounds, crouching or crawling in restricted areas, and defending oneself or others against physical attack. The Guide describes Level 8-3 work as requiring regular and protracted periods of considerable strenuous physical exertion such as carrying or lifting heavy objects (over 50 pounds), hacking passages through dense vegetation; or climbing ladders or scaffolds carrying heavy equipment used to install, maintain, or repair research facilities. The appellant's work involving responsibility for the Zone aviation program does not involve this degree of physical exertion. Therefore, Level 8-3 is not credited.

Level 8-2

20 points

Factor 9. Work Environment

At Level 9-2, the employee works in areas with moderate risks or discomforts that require the use of special safety precautions. The appellant frequently works outdoors and around aircraft and must observe safety procedures and wear protective clothing, including winter clothing, fire resistant clothing, and protective boots. This type of work matches Level 9-2.

Level 9-3 is not described in the GS-2102 standard. According to the Primary Standard, at Level 9-3 the work environment involves high risks with exposure to dangerous situations or unusual environmental stress which require a range of safety and other precautions. e.g., working at great heights under extreme outdoor weather conditions, subject to possible physical attack or mob conditions, or similar situations where conditions cannot be controlled. The Guide describes work at Level 9-3 as involving high risks with regular and recurring exposure to dangerous situations or unusual environmental stress where high risk factors exist which cannot be reasonably controlled. For example, this level may involve working a great heights under extreme weather conditions, or working closely with toxins or dangerous pests or animals such as poisonous snakes, where safety precautions cannot completely eliminate the danger. The appellant does not work in such dangerous conditions or in situations in which risks cannot be reasonably controlled. Therefore, Level 9-3 is not credited.

Level 9-2

20 points

Factor Summary for Nonsupervisory Duties

| <u>Factor</u> | <u>Level</u> | <u>Points</u> |
|---|--------------|---------------|
| 1 Knowledge Required by the Position | 1-5 | 750 |
| 2 Supervisory Controls | 2-3 | 275 |
| 3 Guidelines | 3-3 | 275 |
| 4 Complexity | 4-3 | 150 |
| 5 Scope and Effect | 5-3 | 150 |
| 6/7 Personal Contacts/Purpose of Contacts | 6-2/7-B | 75 |

| | | |
|--------------------|-------|-----------|
| 8 Physical Demands | 8-2 | 20 |
| 9 Work Environment | 9-2 | <u>20</u> |
| | Total | 1715 |

The total number of points credited, 1715, converts to a grade of GS-8 (1605-1850) according to the grade-conversion tables in the Guide and in the Primary Standard. Therefore, the appellant's nonsupervisory Zone Aviation Officer duties are evaluated at the GS-8 level.

As part of his Zone Aviation Officer work, the appellant conducts brief classroom instruction, mostly for Zone employees, and primarily related to aircraft safety precautions. This work does not constitute 25 percent of his work time and thus cannot be grade-controlling. However, we note that evaluation of the work by application of the Grade Level Guide for Instructional Work yields a grade of GS-7 for the instructor work. At the GS-7 level, instructor assignments typically involve short, repetitive courses or course units that are highly structured. Instructors at this level work independently. They may make suggestions for course modification which are primarily procedural, and they may occasionally make substantive recommendations. The appellant teaches short courses using standard lesson plans that are developed by others and highly structured. The courses range in duration from about one day to one week.

Instructors at the GS-9 level teach courses on a wide variety of topics in well-established areas of a subject-matter field, e.g., courses in a technical service school in the fundamentals and skills of a technical occupation or courses taught in the secondary through basic undergraduate levels. Instructors at this level need to give concrete expression to the abstract principles and concepts taught at this level. They make recommendations for changes which involve substantive rather than procedural matters. They independently plan and carry out their training sessions within the prescribed course framework. They may participate in task analyses for determining training requirements or in special staff studies of training and testing materials. An example of an instructional assignment at the GS-9 level is a course in the maintenance and repair of designed components of various models of aircraft requiring explanation of the theoretical factors underlying maintenance and repair problems and keeping up to date on changes in equipment. Also at this level are standardized or highly structured courses in maintenance and repair of major aircraft systems for various models of aircraft. The appellant's courses do not cover the variety of topics or involve the wide range of teaching methods described at this level, as illustrated by the example cited. Therefore, his instructional work does not exceed the GS-7 level and would not increase the grade of the position even if it accounted for 25 percent of the work time.

The appellant also spends a small portion of his time performing nonsupervisory work in fire suppression and related tasks. This work constitutes approximately 20 percent of his work time, and thus cannot control the grade of his position. However, the grade of these functions would be lower than the grade of his other work, as evaluated above, because the highest grade of the nonsupervisory positions assigned to perform such work is GS-4, and the positions of the crew chiefs who perform similar work are classified at the GS-5 level. Therefore, this work would not

increase the grade of the position even if it accounted for 25 percent of the appellant's work time.

In summary, the appellant's supervisory duties are evaluated at the GS-8 level, and his nonsupervisory Zone Aviation Officer duties are also evaluated at the GS-8 level. Other work which cannot be grade-controlling (because it is performed for less than 25% of the time) is evaluated at lower levels. Therefore, GS-8 is the appropriate grade level for the position.

DECISION

For the reasons given above, the authorized classification of the appealed position is Supervisory Range Technician, GS-455-8.