

# ARS □ CSREES □ ERS □ NASS

## *Policies and Procedures*

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This P&P discusses position management and position classification, including position descriptions, classification audits, evaluation statements, and classification appeals. Category 1 research positions are excluded from coverage of this P&P.

## Table of Contents

1.	Introduction . . . . .	4
2.	Position Management . . . . .	4
	Definition . . . . .	4
	Policy and Principles . . . . .	4
	Implementation . . . . .	5
3.	Position Classification . . . . .	5
	Definition . . . . .	5
	General Schedule (GS) System . . . . .	6
	Federal Wage System (FWS) . . . . .	6
4.	Position Descriptions . . . . .	6
	Who Needs a PDS and Who Does Not . . . . .	6
	When to Write the PD . . . . .	7
	Who Should Write the PD . . . . .	7
	Content . . . . .	7
	Formats . . . . .	9
	Modification of Existing PDs . . . . .	11
	Standard Position Descriptions . . . . .	12
	Certifying PD Accuracy . . . . .	13
5.	Classification Audits . . . . .	13
	General Definition . . . . .	13
	Types of Classification Audits . . . . .	13
	Participants . . . . .	14
	Required Audits . . . . .	14
	Requesting an Audit . . . . .	15
	Documents Needed Prior to the Audit . . . . .	15
	Conducting the Audit . . . . .	15
6.	Evaluating the Position . . . . .	16
	The Evaluation Process . . . . .	16
	Use of Standards/Rules Governing the Primary Standard . . . . .	16
	Basic Principles of Evaluation . . . . .	17
	Handling Controversial Actions . . . . .	19
	Need for Consultation . . . . .	19
	Final Review and Approval . . . . .	19
7.	Issuing the Classification Decision . . . . .	20

	Initial Notification . . . . .	20
	Formal Publication of the Decision . . . . .	20
	Actions Requiring Written Explanations . . . . .	20
	Content and Format of Formal Evaluation Statements . . . . .	21
	Access to Evaluation Documents . . . . .	21
	Responding to Classification Decisions . . . . .	21
8.	Reconsideration . . . . .	22
9.	Classification Appeals . . . . .	22
	What May Be Appealed . . . . .	23
	What May Not Be Appealed . . . . .	23
	What May Be Neither Appealed Nor Grieved . . . . .	23
	Who May File an Appeal . . . . .	24
	Representation . . . . .	24
	Where to File an Appeal/Appeal Options . . . . .	24
	When to File an Appeal . . . . .	26
	Information Required to File an Appeal . . . . .	26
	Canceling an Appeal . . . . .	27
10.	Summary of Responsibilities . . . . .	27
11.	Glossary . . . . .	29
	Exhibit 1 . . . . .	33

## **1. Introduction**

Federal agencies are created by law and Executive Order to accomplish specific missions in the furtherance of national goals. Federal managers and supervisors who have delegated authority have the obligation to structure the agency in a manner which will assure that assigned missions are legally, efficiently, and effectively accomplished. The structuring process involves the assignment of missions and functions to major organizational elements. Eventual subdivision of missions and functions into systems, processes, and tasks brings the organizational process to the basic unit - the position.

This P&P pertains to all positions within REE **except** SES, senior-level (SL), and scientific and technical (ST) positions in all agencies; economist and other social scientist positions in ERS; and research scientist positions (i.e., Agency-designated Category 1 positions) in ARS. For information on the classification of ARS research scientists, see P&P 431.3.

## **2. Position Management**

### **Definition**

Position management is the continuous and systematic process of assuring that organizations and positions are structured efficiently and economically. It is the series of steps that managers and supervisors go through to determine the type of organizational structure that is required to fulfill the function(s) assigned to a particular unit, how many positions are needed, and how positions should be designed.

### **Policy and Principles**

REE agencies will establish and maintain only those positions necessary to accomplish agency programs in the most effective, efficient, and economical manner. In line with this policy, managers will observe the following position management principles in determining organizational structure, developing staffing plans, and assigning duties to individual positions:

- Establish the fewest number of positions essential to accomplish the functions assigned.
- Structure positions clearly and discretely to avoid overlapping of duties, unnecessary positions, or fragmentation of work processes.
- Abolish vacant positions if the duties can be redistributed or eliminated.
- Optimize supervisor/employee ratios.

- Limit the number of deputy or assistant positions, both line and staff.
- Minimize the number of organizational levels, with emphasis on decentralization and delegation to the lowest possible working level.
- Hire at the “entry” or “technician” level whenever possible to ensure a balance between employees who perform the full performance level duties of the unit and the development of employees who perform more routine and lower level tasks.
- Establish positions in such a way as to encourage career development and allow cross-training, consistent with the need to recruit and retain a diversified work force.

## **Implementation**

While agencies generally take the lead, the Human Resources Division (HRD) plays an essential supporting role in ensuring sound position management. HRD and agency managers and supervisors will work together to assure that:

- Positions and organizations are structured in accordance with sound position management principles.
- Each employee has a current and properly classified position description which adequately describes the work assigned.

## **3. Position Classification**

### **Definition**

Position classification is the systematic process of assigning the proper titles, occupational series codes, and grades to positions. The Federal Government has two main classification systems: The General Schedule (GS) classification and basic pay system, and the Federal Wage System for trades and crafts occupations.

### **General Schedule (GS) System**

The GS classification system is codified in law. The law establishes fifteen grades and describes the level of work at each grade. The purpose of the classification system is to ensure that equal pay be provided for substantially equal work and that work be classified based on its difficulty, responsibility, and qualification requirements. The law provides the Office of Personnel Management (OPM) with a central role in establishing classification standards and reviewing

agency classification actions (through periodic audits and hearings of employee appeals). OPM has the final authority in classification matters.

## **Federal Wage System (FWS)**

The FWS is in law to provide an equitable system for fixing and adjusting the rates of pay for prevailing rate employees of the government. The law directs that common job standards, wage policies, and practices be developed to insure interagency equity in wage rates and to bring about equitable coordination of wage-fixing practices among the different executive departments and agencies.

## **4. Position Descriptions**

A position description (PD) (a.k.a. “job description” when applied to FWS positions) is a statement of the major duties and responsibilities, knowledge required to perform the work and supervisory relationships of a given position. It briefly outlines what an employee in a specific job is expected to do and how the work is supervised. If the position is supervisory, the PD will also address the type and scope of supervision exercised. Position descriptions are the basis for performance standards.

### **Who Needs a PD and Who Does Not**

Virtually every position in the Federal Government requires a PD. Among the exceptions are:

- Collaborators (a statement of duties is required, but no PD).
- Experts and consultants **not** appointed under Title 5 authority (e.g., hired as contractors).
- Volunteers.
- Private sector temporaries.

### **When to Write the PD**

A PD **must** be written and approved and the work classified **before** the position can be filled. The only exception to this rule involves details. Employees may be detailed to a position without a PD, but they cannot be formally assigned to the position until the duties have been described and classified.

## Who Should Write the PD

Since managers and supervisors are responsible for assigning the work and know what their needs and expectations are, they should play the primary role in writing PDs for the positions they supervise. The servicing personnel management specialist is available to offer advice and assistance, but the specialist has only a general impression of what the duties of the position might be. Management must take the lead and provide the facts.

If the PD being prepared is a redescription of an existing, currently filled position, the incumbent in that position should also become involved. The incumbent may better understand the duties of a position since he/she is actually performing the work. Employee input is a valuable resource that should not be overlooked.

The writing of a PD is, therefore, a cooperative effort with management, the personnel management specialist, and, in some cases, the employee contributing to the final product.

## Content

**Duties.** The PD covers only **major duties**; it does not describe everything an employee does or might conceivably be asked to do, nor should it attempt to do so. A PD must outline all the major duties—the tasks that occupy the most time (usually 25 percent or more) are the most difficult or challenging, or draw upon particular skills, and depict the supervisory relationship.

**Leadership Competency Model for Selection and Promotion.** The Department directs USDA agencies to incorporate leadership competencies into knowledges, skills, and abilities (KSAs) for all supervisory and managerial positions. The following is the language currently approved for duty statements:

The incumbent is responsible for expressing ideas and facts to individuals or groups effectively. This also includes listening to others, facilitating an open exchange of ideas, and team building.

The incumbent is responsible for motivating and guiding employees, ensuring staff is appropriately utilized and developed, and adapting leadership style to various situations.

Provides technical and administrative supervision. Is responsible for making selections for positions, assigning duties, reviewing work, approving/disapproving leave, and evaluating performance. Assures equal opportunity is extended to all employees supervised and all candidates for employment without regard to race, color, religion, sex, national origin, age, or nondisqualifying handicapping condition. Assures affirmative implementation of Equal Employment Opportunity plans of action and applicable Civil Rights provisions which includes full consideration of eligible minority group members and women in filling vacant positions; providing career counseling and orientation; enhancing career

opportunities through training and development, job redesign, and/or similar techniques; and ensuring full consideration of these employees in recommending promotions, awards, and other forms of special recognition.

**Qualifications.** The PD should reflect the basic qualifications needed to perform the work and they should be obvious from its content. If for some reason those specialized requirements are **not** readily apparent, they should then be specifically noted (e.g., foreign language requirement).

**Conditions of Employment.** If the incumbent in a position must meet certain licensing requirements (e.g., commercial driver's license or pesticide applicator's license) or undergo any type of medical screening (e.g., drug testing or vaccination requirements), those special demands must be addressed in the PD.

**Civil Rights Statement for Supervisors.** The Department requires that all supervisory PDs contain a statement outlining the position's responsibility for upholding Civil Rights. The following is the language currently approved for that statement:

Assures that equal opportunity is extended to employees supervised which includes full consideration of eligible minority group members and women in filling vacant positions; holding individual and group meetings to communicate equal opportunity and program missions; providing career counseling and orientation; enhancing career opportunities through training and development, job redesign and similar techniques; and ensuring full equal consideration of these employees in recommending promotions, awards, and other forms of special recognition.

**Collateral Duties.** Collateral duties are official duties and responsibilities assigned by appointment to an employee **in addition** to the primary duties and responsibilities of the position the employee occupies. Collateral duties may be performed for no more than **20 percent** of official duty time. The employee receives technical guidance and review, but not supervision, from an individual other than the immediate supervisor, e.g. the Civil Rights Manager. Collateral duties are attached as an addendum to the employee's PD.

**Percentage of Time.** When a position contains substantially different kinds of work (mixed position), identify an approximate percentage of time required for each major duty.

## **Formats**

The intent of the PD is to communicate information; all other concerns, including formatting, are secondary. However, documents whose contents are arranged in a logical and uniform fashion are more useful and efficient. Two main PD designs are used: the narrative format and the Factor Evaluation System (FES) format.

**Narrative Format.** A narrative PD “narrates the story” of a position, using complete sentences and paragraphs. The narrative style focuses more on the position as a whole. A narrative PD normally includes the following sections:

- Introduction: States the primary purpose of the position and describes its relationship to the rest of the organization.
- Nature of Assignment and Level of Responsibility: Outlines the important, regular, and recurring duties and responsibilities assigned to the position.
- Supervision Received: Describes how the work is assigned, the type of supervision and guidance received, and the kind of review to which the work is subject either in progress or upon completion.
- Special qualification requirements: States any knowledge, skill, education, or certification required by the position if the requirement is not already apparent from reading the other sections of the PD (e.g., foreign language proficiency).

**Factor Evaluation System (FES) Format (General Schedule (GS) positions only).** FES is a method of evaluating nonsupervisory GS positions by assessing nine aspects of the job (i.e., “factors”) and assigning points to those factors. PDs drafted in FES format consist of a brief listing of the major duties followed by a description of the work in terms of the nine factors. The nine factors, briefly described, are as follows:

- Factor 1: Knowledge Required by the Position
  - Type of knowledge or skills needed.
  - How the knowledge or skills are used in doing the work.
- Factor 2: Supervisory Controls
  - How the work is assigned.
  - Employee’s responsibility for carrying out the work.
  - How the work is reviewed.
- Factor 3: Guidelines
  - Nature of guidelines (e.g., manuals, policies, procedures) available to assist in performing the work.

- Judgment needed in applying the guidelines or in developing new guides.
- Factor 4: Complexity
  - Nature of the assignment.
  - Difficulty in identifying what needs to be done.
  - Difficulty encountered and originality required in performing the work.
- Factor 5: Scope and Effect
  - Purpose of the work.
  - Impact of the work product or service (i.e., who or what benefits from the work).
- Factor 6: Personal Contacts
  - People contacted in the course of the work and the conditions/setting under which those contacts are made.
- Factor 7: Purpose of Contacts
  - Reason for maintaining the personal contacts noted in Factor 6.
- Factor 8: Physical Demands
  - Nature, frequency, and intensity of physical activity.
- Factor 9: Work Environment
  - Risks and discomforts caused by physical surroundings and the safety precautions needed to avoid accidents or discomfort.

**Format Requirements. CSREES, ERS, and NASS** may use either the FES or narrative format. **ARS** will use the FES format to describe all non-research GM/GS positions.

It is particularly important that managers and/or employees contact their servicing personnel management specialist and discuss their needs and options before they begin writing a new PD.

PD writing can be a shared responsibility and communication is fundamental to the process. These discussions should focus not only on content but on formatting concerns as well.<sup>1</sup>

**Federal Wage System (FWS) Job Descriptions.** No specific format is required for FWS job descriptions. It is, however, essential that the content of the description address the following factors or aspects of the job, preferably in the order indicated:<sup>2</sup>

### **Supervisory Jobs**

- Nature of Supervisory Responsibility
- Level of Work Supervised
- Scope of Work Operations Supervised

### **Nonsupervisory Jobs**

- Skill and Knowledge
- Responsibility
- Physical Effort
- Working Conditions

## **Modification of Existing PDs**

**Major Changes.** Whenever a significant change takes place in the major duties of a position or in the way those duties are supervised, a new PD must be drafted and evaluated. This means the addition or deletion of a major duty or a change in level of supervisory controls over the work. Any change in the position that will affect the title, series, or grade requires a new PD.

**Minor Changes.** Changes in a PD that will **not** affect the title, series, or grade can usually be accommodated through minor editing. If the modification only involves a word or two, the change may easily be handled through a “pen and ink” correction. If the change involves several

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<sup>1</sup>For more complete information on how to write PDs for GS positions, using either the narrative or the FES format, see “The Classifier’s Handbook” (August 1991), Chapter 3. To obtain a copy, contact the REE Classification Officer.

<sup>2</sup>For more information, see the FWS Job Grading Standard for Supervisors (December 1992) and/or the Federal Wage System Operating Manual (1996 update). Copies of both documents may be obtained by contacting the REE Classification Officer.

phrases or paragraphs, then the modifications may be typed on a separate page and attached to the PD as an amendment.

**Statement of Difference.** Statement of difference (SOD) is a succinct description of the differences between the duties, responsibilities, or working conditions set forth in a currently established position description, and those of the position being described. When a position being described is substantially similar to an existing position in the same organizational unit and classified with the same series and title, it may not be necessary to draft an entirely new PD. In many cases, the already classified and approved PD may be used along with a brief statement describing how the two positions differ.

A SOD is particularly useful when management decides to fill a position at a grade level below the full performance level. In such a case, the PD for the new position would consist of the classified and approved PD for the full performance level work plus a statement addressing the modified expectations associated with the lower grade (e.g., at the lower grade level, supervision would normally be increased while knowledge required to perform the work would be decreased).

A SOD may **not** be used to describe higher level duties (i.e., the grade of the already existing PD must be at or above the grade of the position being described), nor should it be used to describe supervisory or leadership positions.

While use of the statement of difference is not mandatory, it does promote efficiency. It is, therefore, an option that is encouraged.

## **Standard Position Descriptions**

Standard PDs (also referred to as “generic” or “prototype” PDs) are available for a large number of positions within the REE agencies. A standard PD is an “off the shelf” document that may be used “as is” without change to describe the work of several positions within an organization whose duties are basically the same. Since these standard documents have already been evaluated and classified, no further review is necessary. There is, however, one important exception: If the duties of a position have changed and a standard PD is proposed as a valid description of the work now being performed by the incumbent and the level of that work **exceeds the recognized full performance level for that position** (i.e., the PD is being used to support a promotion based on accretion of duties), an audit and evaluation **will** be required.<sup>3</sup>

The use of standard PDs is another time savings option that is encouraged. As was noted above, a PD is not by definition a source of detailed information about a position. Rather, it is intended to provide a general overview of the work while highlighting the major duties. In normal

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<sup>3</sup>See Section 5, page 14, “Required Audits” and Section 6, page 18, “Accretion of Duties” for more information.

circumstances, standard PDs are fully adequate for this purpose. More specific information on duties and responsibilities and the way they are to be performed should be included in performance standards for the position, not in the PD itself.

Copies of many standard PDs are available in hard copy and may also be accessed via HRD's Home Page: [www.ars.usda.gov/afm/hrd](http://www.ars.usda.gov/afm/hrd).

## **Certifying PD Accuracy**

All PDs must include a statement signed by the immediate supervisor testifying to the truth and accuracy of what has been written. This is accomplished by signing and dating the appropriate blocks of the AD-332, Position Description Cover Sheet, authorized for use within the Department. (Partially completed AD-332's have been provided for many of the standard PDs. These "standard" AD-332's must be signed by the immediate supervisor.) The second-level supervisor **may** sign and date the form by using Blocks 22 and 23. In **all** situations, the first-level supervisor's name and title will appear in Block 21 of the AD-332.

## **5. Classification Audits**

### **General Definition**

A classification audit is a review of the duties and responsibilities comprising a position. In most cases, an audit is a conversation or a series of conversations about the position. It is a fact finding mission, with the reviewer (usually the servicing personnel management specialist) asking most of the questions and the incumbent and/or the incumbent's supervisor providing most of the answers. As published in HRD's Customer Service Plan, audit requests are typically processed within 60 days of receipt of all documents needed prior to the audit.

### **Types of Classification Audits**

**Paper Review.** Whenever personnel management specialists review a PD and check the duties described against an appropriate standard, they are technically performing an audit. However, in actual practice, this type of activity is referred to as a "paper review." When the term "audit" is used, it refers to either a **desk audit** or a **supervisory audit**.

**Desk Audit.** The most common type of audit is the desk audit, which is a personal interview of the incumbent by the personnel management specialist assigned to review the work. This

interview frequently takes place in the incumbent's work space, although it could most certainly occur elsewhere or be conducted over the phone.

**Supervisory Audit.** Whenever an established, unfilled position is being reviewed, the main source of information about that position must be the position's supervisor. The conversations which take place between the supervisor and the personnel management specialist regarding the work of the position constitute the supervisory audit.

Supervisory audits, however, are not limited to vacant positions. Since supervisors control the work, their viewpoint is invaluable to the classification process. It is wise, therefore, to conduct both a supervisory audit and a desk audit whenever a position is being reviewed. This will ensure that a balanced picture is presented.

## **Participants**

As noted earlier, the servicing personnel management specialist and the incumbent are the primary players in the audit process, although the incumbent's supervisor and/or other subject matter experts might also be interviewed. Interviewing the supervisor is a fairly common and widely recommended practice; interviewing subject matter experts is usually not necessary, except in the case of highly technical or scientific occupations.

## **Required Audits**

An audit will be necessary **only** when:

- An upgrade of a position has been requested that would raise the grade above the established full performance level for the position.
- The position is a "mixed series" position, i.e. the position is composed of work in two or more series.
- The position is in an occupation for which no standard has been published.
- The position is being reclassified in a new series.
- The audit is part of a classification review project in which a specific set of positions is examined to ensure that the PDs are accurate and that the classification standards have been applied consistently across the organization.
- The audit is part of a human resources management evaluation, which is the periodic inspection of an organizational unit conducted to determine the overall effectiveness of the unit's human resources management program.

- A new classification standard has been issued, and OPM has directed that agencies audit and evaluate all positions affected.
- The incumbent in the position or the incumbent's supervisor specifically requests an audit.

### **Requesting an Audit**

An employee or the employee's supervisor may request an audit at any time, provided significant changes have taken place within the position to merit such a review.

Ideally, the audit process will begin with a series of discussions. An employee may initiate this process by contacting the servicing personnel management specialist for an assessment of the case and advice on how to proceed. But, more importantly the employee should first sit down with the supervisor. Quite frequently problems associated with duty assignments or PDs can be resolved informally at the local level, preempting the need for a formal audit.

But even if such swift resolution does not take place, early involvement on the part of the supervisor is still necessary. An employee-generated request for an audit must be forwarded via the supervisor, and supervisory approval will be needed should the PD require updating or other modification prior to review.

### **Documents Needed Prior to the Audit**

The following three documents will be needed before an audit can take place:

1. Up-to-date and approved PD describing the duties of the position with a signed and dated AD-332.
2. SF-52, Request for Personnel Action, requesting that the duties be reviewed.
3. Brief statement from either the incumbent or the supervisor addressed to the servicing personnel management specialist describing the changes that have occurred within the position, thereby justifying the need for an audit. (Note: Submission of this statement may be waived at the discretion of the personnel management specialist.)

### **Conducting the Audit**

Most desk and supervisory audits are conducted through face-to-face meetings or by telephone, with the personnel management specialist interviewing the incumbent and/or the incumbent's

supervisor. The personnel management specialist will review the PD and ask questions related to the duties and responsibilities assigned.

Prior to the interview, the personnel management specialist may provide the incumbent and/or the supervisor with a list of position specific questions so they will know what to expect and can organize their thoughts prior to the actual interview. A written response is not required.

Prior to or during the course of the interview, the incumbent may be asked to provide a small selection of work samples to illustrate and clarify the work being done. These requests, however, should be **kept to a minimum**, and every effort should be made to avoid making the process overly burdensome.

Since the absence of face-to-face contact does make telephone interviews somewhat more challenging, it is especially important to carefully document what was said and heard during the call. As soon as possible after hanging up the phone, the personnel management specialist conducting the audit should prepare their audit notes for the file summarizing the facts that were gathered.

## **6. Evaluating the Position**

### **The Evaluation Process**

Evaluation is essentially a matter of comparison. The individual classifying the job (usually the servicing personnel management specialist) looks at the duties and responsibilities assigned to the position and how those duties are exercised and compares that information with the various types of work described by OPM in its published standards. With reference to these standards, the personnel management specialist can determine in which occupation the position in question fits and what grade and title would be most appropriate.

### **Use of Standards/Rules Governing the Primary Standard**

Depending on the nature of the assigned duties, a single classification standard or a combination of standards may be used in assessing the work and determining the series and grade. As noted earlier, these standards are usually presented either as a narrative discussion or in the more structured FES format. The main difference between the two “formats” is that the narrative format offers only words, while the FES format offers both words and numbers and therefore appears slightly less subjective.

Another point separating the two formats is the presence within FES of an extra tool to aid the classification process. That extra tool is the Primary Standard, which is sometimes referred to as the “standard for standards,” meaning that it may be employed as a reference whenever the FES standard being used to evaluate the work proves inadequate (i.e., the work of the position either

exceeds or fails to meet certain of the criteria outlined in the standard). The availability of this tool can sometimes prove advantageous.

OPM has issued instructions on how to apply these standards, including the Primary Standard. No attempt will be made to repeat that guidance here.<sup>4</sup> There are, however, two important rules that are frequently neglected and therefore deserve to be stressed:

- The Primary Standard can **never** be used alone as the sole basis for classifying a position. It can only be used as a supplement to other standards.
- **And**, those other standards **must** be FES standards. The Primary Standard may be used to amplify or extend an FES standard, but it **cannot** be used to amplify or extend a narrative standard.

## Basic Principles of Evaluation

The results of the evaluation process are sometimes poorly understood, not because the process is especially complex, but because certain basic principles are either unknown or underappreciated. It is important that both management and employees acknowledge and understand the following concepts as they relate (or fail to relate) to classification:

**Range of Duties.** Each grade level represents a **range** of duties and responsibilities. To some extent, the work of a position may expand and even become more difficult without affecting the grade. Several positions in a given organization may, for example, look identical on paper, sharing the same series and grade, but there may, in fact, be some variation in how the work is performed. One of the positions might be in the lower part of the grade range, another in the middle, and the third in the upper part of the range. To a limited degree, the standard(s) used to evaluate the work will accommodate shades of difference from one position to another.

**Amount of Work.** Quantity alone does not count. An employee may be doing more work, but unless those additional duties are more difficult and more complex than those performed previously, the grade of the position will not be affected. Volume is not a factor: Performing “more of the same” at the same level of complexity will not raise the grade.

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<sup>4</sup>For guidance on how to classify a position, see the “Introduction to the Position Classification Standards” (August 1991) or the “The Classifier’s Handbook” (August 1991). Both publications were issued by OPM. Copies of these documents may be obtained by contacting the REE Classification Officer.

**Performance.** A position is classified, **not** the employee in the position. Classification actions neither measure nor reward performance. An employee's performance in a job has no direct relationship with the classification of that job. Classification measures **what** an employee is asked to do, **not** how well the employee does it.

Admittedly, an exceptional employee may (by virtue of performance) draw more complex duties into the assignment area (see below under **Accretion of Duties**). On the other hand, a poor performer may cause the job to deteriorate as duties normally resting with the position are reassigned elsewhere. Either of these situations might result in an altered grade, but in neither case was performance alone an issue. Performance changed the job, and the change in the job changed the classification. Superior or inferior performance in and of itself would not have done so.

Since the upgrade of a position does not recognize performance, classification must not be viewed as part of the awards program. Unfortunately, the fact that promotions are happy occasions and that money is involved invariably clouds this issue.

**Length of Service.** An employee's length of service in a position has no bearing on its classification. Requesting a promotion is not an acceptable way to thank an employee for long years of faithful service. The various award options available through the Agency's awards and recognition program should be used for this purpose.

**Other Positions.** Positions are compared against standards, not against other positions. The classification of what appears to be a similar position in another organization is essentially irrelevant to the classification at hand.

**Automation.** The use of computers may sometimes increase a position's productivity, but increased productivity alone will not affect the grade. If the basic work processes remain the same, the grade will remain the same. When the nature of the work does change as a result of new technology, the grade is as likely to decrease as it is to increase. Automation may simplify the work, thereby lowering the grade. Or it may allow the work to expand, with the employee tackling more complicated assignments that, prior to automation, would not even have been attempted. In the latter case a higher grade could, in fact, be contemplated.

**Accretion of Duties.** Any position may evolve over time. When new **higher level** duties are **permanently** added to a position for whatever reason and the additional duties constitute a substantial portion of the employee's overall workload, the classification of the job must be adjusted to reflect this change. The action in these instances would be a noncompetitive promotion, based on accretion of duties. It is important to note that successive noncompetitive promotions of the same employee in the same job based on accretion of duties are in violation of merit principles and are not in the Agency's best interest.

**Impact of the Person on the Job.** When a significant number of new **higher level** duties are added to a position due to the **incumbent’s special skills or abilities**, the classification of the position must be adjusted to reflect this change. In this instance, the action would be a noncompetitive promotion, based on the impact of the person on the job. The PD must be noted in the remarks section “Incumbency Only Allocation.”

Admittedly, it is sometimes hard to distinguish an “impact” action from an “accretion” action. The difference becomes important, however, when the position is ultimately vacated. At that point, a position that was upgraded based on employee impact must be reassessed and reevaluated and will, in most cases, revert to its previous classification. In contrast, a position upgraded through accretion of duties could possibly retain the higher grade, depending on the circumstances of the case.

### **Handling Controversial Actions**

Special care must be taken with classification actions that are unusually complex, controversial, or otherwise precedent-setting. Communication and cooperation are key.

### **Need for Consultation**

The fundamental classification process is the same for every position regardless of outside considerations or long range impact. The servicing personnel management specialist performs basic fact finding for a well established position and evaluates the position using the appropriate standard(s). When reviewing an unusually complex, controversial, or otherwise precedent-setting position, the personnel management specialist will also check the database for similar positions, gather information from counterparts within HRD and, if appropriate, convene meetings with other specialists to discuss relevant issues. When comfortable with the classification decision, **and prior to certifying the position**, the personnel management specialist will submit a copy of the position description and evaluation statement or classifier’s note to the HRD team leader and branch chief, then to the REE Classification Officer for review.

### **Final Review and Approval**

The HRD branch chief will review the classification decision, providing concurrence or nonconcurrence, and, if appropriate, will discuss the decision and its ramifications at the weekly HRD branch chiefs’ meeting. The REE Classification Officer will ensure that all interested parties are apprised of the decision and will keep it on file along with other significant classification decisions.

## 7. Issuing the Classification Decision

### Initial Notification

It is important that the first news of a classification decision be communicated personally by phone or in a face-to-face meeting to the supervisor of the position. Speaking personally to the most interested parties will give them an opportunity to ask questions and, if the news is not good, the personal touch can sometimes be more effective.

### Formal Publication of the Decision

The final classification decision may be published in three different ways:

**Points Assigned.** If the position was evaluated using an FES standard (or a guide or standard similar to FES which uses a factor-point conversion), the points awarded will be recorded on the AD-332, Position Description Cover Sheet. The notation of these points will provide sufficient record of the classification decision. A brief note explaining the rationale must be annotated on the front of the AD-332 when the points assigned a FES factor deviates from the FES grade-level pattern. Any additional written narrative will be necessary only in unusual circumstances (see the following subsection, “Actions Requiring Written Explanations,” for details).

**Evaluation Statement.** An evaluation statement is a written narrative explaining why the position was placed in a specific series and why it was assessed at a certain grade. The statement will normally include some structured comparison matching the position against the criteria provided in the standard(s).

**Classifier’s Note.** A classifier’s note is very similar to an evaluation statement, but it is less comprehensive and therefore shorter and less formal. While brief (usually about a page), the note will contain enough information to form the basis for a full evaluation statement, if the writing of such a statement should ever become necessary (e.g., in the event of an appeal).

### Actions Requiring Written Explanations

Every classification action does not need to be explained in writing. A formal comprehensive statement **or** a classifier’s note will be prepared **only** when:

- The position is classified above the current established full performance level.
- The position is classified to an occupational series where no grade level criteria exist (i.e., the position is classified by analogy with reference to a related standard or multiserie guide; most positions classified to a general series [e.g., GS-301] would fall into this category).

- The position is “mixed” either in terms of series or grade (i.e., the position includes duties associated with two or more series and/or two or more different grade levels).
- The classification action may establish a precedent for other like positions across the mission area.
- The classification appears likely to result in a classification appeal, (e.g. when a request for promotion is denied).

## **Content and Format of Formal Evaluation Statements**

The evaluation statement should be written clearly and concisely. The information may be recorded on a preprinted form designed for that purpose or on plain bond paper, the focus being on **content**, not on format.

The report should concentrate on those aspects of the job that were crucial in determining the final grade. Since all factors contained in a given standard are not necessarily equal in impact, it is seldom necessary to discuss them all. Factors, for example, that received maximum credit during a previous evaluation and were not changed as a result of the most recent review need not be addressed.

Written statements answer questions about a classification decision, either now or in the future, and should be discussed in sufficient detail to provide a reasonable response. An evaluation statement should demonstrate the basic logic that governed the decision and briefly, but clearly, specify which aspects of the job were important to the classification (and, if pertinent, which were not).

## **Access to Evaluation Documents**

Evaluation statements, classifier’s notes, and PDs are public records and therefore releasable to management, employees, other agencies, or the general public. OPM’s published classification standards are also public documents and must be made available to anyone who wishes to see them.

## **Responding to Classification Decisions**

**Decision to Upgrade.** Once a position has been reviewed and found to merit a higher grade, the action is usually completed as soon as possible. Should management disagree with the decision, two alternatives are available: management may either (1) allow the action to go through or (2) they may remove the higher level duties from the position thereby maintaining the lower grade. One option that is **not** available is a continuation of the status quo. Either the position is upgraded or the duties are altered; there is no other choice.

**Decision to Downgrade.** Classification reviews seldom conclude with a recommendation to downgrade a position, particularly if the position is encumbered. However, should this occur, the action will not go into effect until the incumbent has been given the opportunity to appeal. If the downgrade action has been processed, the employee may be entitled to retained grade.<sup>5</sup> An employee whose position has been downgraded must receive a written notification explaining the action and outlining the employee's rights to appeal.

**Decision to Retain the Current Grade.** Though the duties of positions may change, or the manner in which the work is performed has changed, the changes may not affect the title, series or grade-level of positions. In such cases, the classification review can conclude with a recommendation to retain the current grade. When this occurs and either management or the employee is dissatisfied with the explanation provided by HRD, the decision may be appealed.

## **8. Reconsideration**

Except for research scientists whose positions are graded by a peer panel evaluation process, an employee may request a review of the title, series, or grade of their position by the REE Classification Officer. A reconsideration is a paper review of the classification decision made by the employee's servicing human resources team and may involve a discussion with the employee and the supervisor. The request should not, however, be initiated until the questions and issues surrounding the case have been discussed with the servicing personnel management specialist and/or the employee's supervisor. These discussions will provide an opportunity to resolve problems based on confusion, misunderstanding, or lack of information. The REE Classification Officer will issue a decision within 60 calendar days from the date of receipt of the request. If the REE Classification Officer fails to issue a decision within the allotted time, the employee may submit a classification appeal to the Department. If the REE Classification Officer's decision is unsatisfactory to the employee, the employee may file an appeal with either the Department or OPM. A request for reconsideration should be sent to:

REE Classification Officer  
USDA, ARS, AFM, HRD, REE Policy Branch  
5601 Sunnyside Avenue  
Beltsville, MD 20705-5103

## **9. Classification Appeals**

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<sup>5</sup>With retained grade, the position is treated for pay purposes as if the downgrade had not occurred. The entitlement to retained grade expires after 2 years, at which time retained pay begins. Under retained pay, an employee receives smaller salary increases than would otherwise have been the case. Retained pay ends when the salary of the downgraded employee equals the top step of the grade to which the employee was downgraded.

## **What May Be Appealed**

The following aspects of a position may be appealed:

- Grade level of the position.
- Official title (but not the organizational title) of the position, when the applicable OPM classification standard has not prescribed the title.
- Occupational series of the position.
- Position's inclusion in or exclusion from the GS or the FWS.

## **What May Not Be Appealed**

The following issues are **not** appealable, but they **may be grievable** under administrative or negotiated grievance procedures:

- Accuracy of the PD, including the inclusion or exclusion of a major duty.
- Assignment or detail outside the scope of the normally performed duties outlined in the PD.
- Accuracy, consistency, or use of any supplemental classification guides issued by the Department.
- Title of the position that OPM has established as the official position title in the published classification standard.

For information regarding grievance procedures, contact the servicing employee relations specialist.

## **What May Be Neither Appealed Nor Grievable**

Recourse is not offered in every case. The following classification issues are neither appealable nor grievable:

- Classification, grade level, or pay system of a position to which an employee is not officially assigned by an official personnel action (e.g., an employee cannot appeal the classification of someone else's position).
- Classification, grade level, or pay system of a position to which an employee is temporarily promoted or detailed. (Note: Excepted from this provision are employees serving under

time-limited promotions for 2 years or more. The classification of these positions is, in fact, appealable to OPM.)

- Proposed classification of a position before the classification action actually takes place.
- Adequacy of the classification criteria contained in an OPM-originated classification standard or guide.
- Classification of a position based on comparisons with other positions (regardless of where those positions are located) rather than with OPM's published standards or guides.
- Classification appeal decision issued by OPM when no changes have occurred in either the major duties of the position or the applicable classification standard(s).
- Rate of pay or the propriety of a wage schedule rate for FWS employees.

## **Who May File an Appeal**

Any employee may file a classification appeal either personally or through a designated representative. A research scientist whose position is classified through a peer panel evaluation process has no reconsideration rights within the Agency and must appeal the peer panel review decision directly to USDA or OPM. An appeal should not be initiated until the questions and issues surrounding the case have been discussed with the servicing personnel specialist and/or the employee's supervisor.

## **Representation**

An employee may designate an individual to assist in preparing and presenting the appeal. In performing these duties, the representative will be free from restraint, interference, coercion, or reprisal.

If the chosen representative is employed by USDA, that individual, along with the appellant, will be allowed a reasonable amount of official time to develop and present the appeal. The amount of time granted will depend upon the facts and circumstances surrounding the case. Arrangements for the use of official time must be made with their respective supervisors.

An appellant's representative may **not** be present during a classification audit nor may the representative participate in any other fact finding activities unless the office conducting the review specifically requests such participation.

## Where to File an Appeal/Appeal Options

**GS Employees.** A GS employee may choose from among the following options:

1. **File an appeal directly with the Department.** An appellant may request that one of the Department's classification appeals officers look at the position and review the classification. This appeal must be in writing and be directed to:

U.S. Department of Agriculture  
Office of Human Resources Management  
Compensation and Employment Division  
1400 Independence Ave., SW  
Room 309-W, Jamie L. Whitten Building  
Washington, D.C. 20250-9603

If the appellant is dissatisfied with the Department's decision, a final appeal may be filed with OPM.

2. **File an appeal to OPM via the Department.** An appellant may wish to file an appeal with OPM but may ask the Department to review the case first. If the Department rules in the appellant's favor, the Department will instruct HRD to take appropriate action and the case will be closed. If, on the other hand, the Department does not rule in the appellant's favor, or if the Department is unable to issue a decision within 60 calendar days following receipt of the case, the Department will forward the case to OPM for a final appeal.
3. **File an appeal directly with OPM.** OPM is the final authority for all classification appeals. The appellant may, however, request a reconsideration which OPM could grant provided the appellant can successfully cast doubt on the technical accuracy of the decision or offer relevant and substantive information concerning the position that had not been presented previously. Appeals to OPM must be in writing and directed to the regional OPM oversight division that has jurisdiction over the case. OPM appeal addresses and jurisdictions are listed in Exhibit 1 at the end of this P&P.

As noted earlier, GS employees may select any or all of the above options. These options, however, must be pursued **separately** and **in the sequence indicated**.

**FWS Employees.** FWS employees must begin the appeal process with the REE Classification Officer. This appeal must be in writing and be directed to:

REE Classification Officer  
USDA, ARS, AFM, HRD, REE Policy Branch  
5601 Sunnyside Avenue  
Beltsville, MD 20705-5103

If the REE Classification Officer fails to issue a decision within 60 calendar days from the date the case materials are received for review, the employee may request that the Department assume jurisdiction. If the employee is dissatisfied with HRD's or the Department's ruling, the employee may file a subsequent appeal with OPM. FWS employees may **not** file an appeal directly with the Department or through the Department to OPM.

## **When to File an Appeal**

**GS Employees.** As a general rule, GS employees may appeal the classification of their position **at any time**.

Timing becomes a factor for GS employees **only** if the action being appealed is a downgrade, and the appellant feels entitled to a retroactive adjustment (i.e., back pay). In such cases, a GS employee must file the initial appeal to either the Department or OPM **no later than 15 calendar days** following the effective date of the reclassification action.

If a GS employee's initial appeal of a downgrade to the Department is unsuccessful and the employee subsequently appeals to OPM, that appeal, too, must be filed within 15 calendar days if the entitlement to back pay is to be preserved. The clock, in this latter instance, starts ticking either on the date the employee receives the Department's decision or on the effective date of the action taken as a result of the classification decision, whichever is later. (Note: These time constraints apply only to downgrade actions. Appeals of all other GS classification actions may be filed at any time.)

**FWS Employees.** As a general rule, an FWS employee may file an appeal **to HRD at any time**. Time, however, does become an issue if the action being appealed is a downgrade and the appellant wishes to preserve entitlement to back pay. In such cases, an FWS appellant must file the initial appeal with HRD **no later than 15 calendar days** following the effective date of the reclassification action.

If an initial appeal to HRD is unsuccessful and the employee chooses to file a subsequent appeal with OPM, this appeal must be filed **within 15 calendar days** following receipt of HRD's decision. This latter time frame applies to all FWS appeal cases that are forwarded to OPM regardless of the type of action being appealed.

## **Information Required to File an Appeal**

Regardless of its destination, every appeal case must include the following information:

- Appellant's name, business address, E-mail address (if available), and business phone number.
- Organizational location of the position (department, agency, division, section).
- Current title, occupational series, pay plan, and grade of the position being appealed.

- Requested title, occupational series, pay plan, and grade.
- Copy of the official PD with a cover sheet or attached statement verifying its accuracy (if the appellant believes the PD is inaccurate, an alternative PD, an outline of alleged discrepancies, and a description of what has been done to correct those discrepancies should also be provided).
- Copy of the most recent classification statement evaluating the position.
- Statement identifying what is wrong with the current classification and supporting the requested classification; reference should be made to the applicable classification standards.
- Name, business address, and phone number of the appellant's representative (if applicable).

### **Canceling an Appeal**

An appeal will be canceled if:

- The appellant requests, in writing, that the appeal be canceled.
- The appellant fails to provide the information needed to support the case.
- The appellant vacates the position being appealed, unless special circumstances (e.g., appellant may be entitled to back pay) dictate that the appeal go forward.

## **10. Summary of Responsibilities**

### **Agency Heads**

- Delegate classification authority, including authority for appeals, to HRD.
- Exercise classification authority in specific cases, in accordance with agency policy or in response to specific requests from agency managers or employees.

## **Supervisors**

- Apply sound position management principles in establishing positions and in assigning duties.
- Develop and, whenever major changes occur, revise position descriptions (PDs) for all positions supervised.
- Certify the accuracy of PDs by signing the AD-332, Position Description Cover Sheet.
- Notify the servicing personnel management specialist whenever changes occur in an employee's position (this would include informing the specialist whenever subordinate positions, either vacant or filled, are no longer necessary).
- Request classification audits for positions supervised in response to changes in assigned duties or in response to employee requests.
- Forward employee-generated requests for classification audits to HRD for resolution.

## **Branch Chiefs, HRD, AFM**

- Review controversial or precedent-setting classification decisions and share information whenever such cases occur.

## **REE Classification Officer, Policy Branch, HRD, AFM**

- Formulates classification policy for the mission area personnel management specialist and provides classification advice and policy assistance to managers, employees, and servicing personnel management specialists.
- Maintains official files of appeal cases filed by REE employees.
- Reviews classification decisions on cases referred to HRD for reconsideration within 60 calendar days following receipt of the reconsideration request.
- Issues an appellate decision on classification appeals of FWS positions; decision must be issued within 60 calendar days following receipt of all necessary documentation.
- Coordinates position management and/or position classification review projects as needed or as requested by management.

## **Personnel Management Specialists, HRD, AFM**

- Provide advice and assistance to supervisors on position management issues.
- Assist supervisors in developing and, as necessary, revising PDs for all positions supervised.

- Perform classification audits as requested by management or in response to other organizational needs (e.g., as part of a classification review project or human resources management evaluation).
- Prepare evaluation statements or classifier's notes whenever the circumstances surrounding the position so require.
- Inform employees of their right to appeal classification decisions and provide information on appeal options and procedures. Personnel management specialists cannot advise employees on whether they should or should not appeal. They can only advise on applicable options and procedures.
- Supply whatever documentation may be requested in conjunction with classification reconsiderations or appeals.

### **All Employees**

- Provide input for supervisors and personnel management specialists in developing and revising PDs.
- Note any changes that may occur in duties assigned or level of responsibility and make sure supervisors are aware of these changes.
- Request a classification audit if the nature of the work has changed or if the current classification appears inaccurate for any other reason.

## **11. Glossary**

**AD-332.** Position Description Cover Sheet. Departmental form used by the supervisor to certify that the statement of major duties and responsibilities of the position description is accurate and by the servicing personnel management specialist that the position has been classified as required by Title 5, U.S. Code.

**Classification Appeal.** An employee's request to the Office of Human Resources Management, USDA, or OPM to review the classification decision of the position to which the employee is currently assigned.

**Classification Audit.** A review of the duties and responsibilities assigned to a position; normally a face-to-face discussion or telephone conversation between the servicing personnel management specialist and the incumbent or the incumbent's supervisor.

**Classification Standard (or Guide).** A set of criteria developed by OPM relating different grade levels (as defined by law) to specific work situations, thereby providing the basis for determining the appropriate title, series, and grade for a given position.

**Consultant.** A person who serves as an advisor to an individual or organizational unit.

**Collaborator.** In ARS, a scientist who, having left the agency (usually through retirement), returns to work in an unpaid, volunteer capacity.

**Expert.** A person with high qualifications in a professional, scientific, or technical field.

**Factor Evaluation System (FES).** A method of assigning grades to nonsupervisory General Schedule positions using nine evaluation factors which are assigned points for different levels. The individual reviewing the work selects the proper level for each factor and the total points “earned” by the position determine its grade.

**Federal Wage System (FWS).** Job grading and pay system that applies to most trade, craft, and labor positions. Under this system, pay is adjusted according to the rates paid by private industry for similar jobs in the same geographic area; commonly referred to as **Wage Grade**.

**Full Performance Level.** The highest grade level assignable to a particular position; the full performance level is reached when all the duties and responsibilities that the organization needs to be performed by a given position are, in fact, being accomplished with the degree of independence desired by management.

**General Schedule (GS).** Basic pay schedule established under Title 5 and adjusted by the President. A position is under the General Schedule if its primary duties require knowledge and experience in a line of work or discipline unrelated to trade, craft, or manual labor occupations.

**Grievance.** A request by an employee or group of employees for personal relief in a matter of concern relating to their employment. The issue grieved must be subject to the control of agency management.

**Human Resources Management Evaluation (HRME).** An inspection of an organizational unit conducted to assess the overall effectiveness of the unit’s personnel management program.

**Major Duties.** Work assignments which represent the primary reason for a position’s existence and which govern qualification requirements. In most cases, major duties are those tasks that occupy at least 25 percent employee’s time.

**Manager.** An employee in a position whose duties require the individual to formulate, determine, or influence the policies of the agency.

**Narrative Format.** A way of “designing” or organizing classification standards and position descriptions which focuses primarily on the nature of the work and the level of responsibility, and invites the reviewer to treat the position as a whole and select the most appropriate overall grade (in contrast, FES focuses on nine separate factors).

**Office of Personnel Management (OPM).** The organizational unit within the Federal Government responsible for developing classification standards, establishing classification policy, and adjudicating appeals.

**Pay Plan.** Pay system or pay schedule under which an employee's rate of pay is determined (e.g., General Schedule, Federal Wage System).

**Position Classification Review.** The process of examining and analyzing positions in order to identify the appropriate pay plan, series, title, and grade for each position.

**Position Description (PD).** A statement outlining the major duties, responsibilities, and organizational relationships of a job.

**Primary Standard.** The nine FES factors described in very broad, general terms, unrelated to any specific series or occupation. It serves as a basic reference for other FES standards, thereby supporting a certain consistency in the development of FES standards and in the application of FES criteria.

**Reconsideration.** An employee's request to the REE Classification Officer, HRD, to review the classification decision of the position to which the employee is currently assigned.

**REE Classification Officer.** An individual located in the Policy Branch of HRD who is responsible for classification policy throughout the mission area.

**Servicing Personnel Management Specialist.** A personnel management specialist within HRD assigned to provide classification and staffing services on a continuing basis to a specific organizational unit.

**SF-52.** Request for Personnel Action. Form used by operating officials or supervisors to request personnel actions (e.g., promotion, recruitment, resignation).

**Supervisor.** A position or employee who accomplishes work through other people by directing, planning, and reviewing their assignments and activities.

**Title 5, United States Code.** The basic law addressing issues related to Government and employees.

James H. Bradley  
Deputy Administrator  
Administrative and Financial Management

## **Addresses for Filing Position Classification Appeals - Exhibit 1**

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### **US Office of Personnel Management Appeal Address and Jurisdiction**

#### **OPM Atlanta Oversight Division**

75 Spring Street, SW., Suite 972  
Atlanta, GA 30303-3109

Alabama, Florida, Georgia, Mississippi, North Carolina, South Carolina, Tennessee, Virginia (except as noted under the Washington, DC Oversight Division)

#### **OPM Chicago Oversight Division**

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

Illinois, Indiana, Iowa, Kansas, Kentucky, Michigan, Minnesota, Missouri, Nebraska, North Dakota, Ohio, South Dakota, West Virginia, Wisconsin

#### **OPM Dallas Oversight Division**

1100 Commerce Street, Room 4C22  
Dallas, TX 75242-9968

Arizona, Arkansas, Colorado, Louisiana, Montana, New Mexico, Oklahoma, Texas, Utah, Wyoming

#### **OPM Philadelphia Oversight Division**

600 Arch Street, Room 3400  
Philadelphia, PA 19106-1596

Connecticut, Delaware, Maine, Maryland (except as noted under the Washington, DC Oversight Division), Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont, Puerto Rico, Virgin Islands

#### **OPM San Francisco Oversight Division**

120 Howard Street, Room 760  
San Francisco, CA 94105-0001

Alaska, California, Hawaii, Idaho, Nevada, Oregon, Washington, Pacific Ocean Area

## **Addresses (Cont'd)**

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### **OPM Washington, DC Oversight Division**

1900 E Street, NW., Room 7675

Washington, DC 20415-6000

### **The District of Columbia**

In **Maryland**: the counties of Charles, Montgomery, and Prince George's

In **Virginia**: the counties of Arlington, Fairfax, King George, Loudoun, Prince William, and Stafford; the cities of Alexandria, Fairfax, Falls Church, Manassas, and Manassas Park; and any overseas area not included above.