



As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a classification certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the Government. The agency is responsible for reviewing its classification decisions for identical, similar, or related positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under the conditions and time limits specified in title 5, Code of Federal Regulations, sections 511.605, 511.613, and 511.614, as cited in the *Introduction to the Position Classification Standards*, appendix 4, section G (address provided in appendix 4, section H).

Since this decision changes the grade of the appealed position, it is to be effective no later than the beginning of the fourth pay period after the date of the decision. The servicing personnel office must submit a compliance report containing the corrected position description and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action.

**Decision sent to:**

[appellant]

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## **Introduction**

On February 1, 2002, the Washington Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from [appellant], who is employed as a Supervisory Park Ranger, GS-025-13, in the [division] under the [directorate], [region], National Park Service (NPS), Department of the Interior, in [city and State]. The appellant requested that his position be classified at the GS-14 level. This appeal was accepted and decided under the provisions of section 5112 of title 5, United States Code.

The appellant had appealed the classification of his position to the Department of the Interior, but that appeal was denied by decision dated January 24, 1997. The appellant claims that his responsibilities have increased significantly since that time, but the National Park Service maintains that the Department's appeal decision is still applicable.

An on-site position audit was conducted by a Washington Oversight Division representative on March 19, 2002, a follow-up audit on May 9, 2002, and a telephone interview with the appellant's supervisor, [name], on May 14, 2002. This appeal was decided by considering the audit findings and all information of record furnished by the appellant and his agency, including his official position description, [number], and other material submitted in the agency administrative report on February 26, 2002.

## **Position Information**

The appellant is the chief of the [division], [region], and is responsible for providing policy direction, program assistance, training, oversight, coordination, and liaison to the parks under [region] jurisdiction for public safety and natural and cultural resources protection. The programs managed include law enforcement, resources/environmental protection, public use management/special park uses, recreation fees and reservation systems, emergency medical services, wildfire and structural fire protection, communications, search and rescue, HAZMAT response, youth conservation services, health and fitness, uniforms, ranger careers, and jurisdictional and regulatory issues.

## **Series Determination**

The appellant's position is properly assigned to the Park Ranger Series, GS-025, which covers work involved in the conservation and use of Federal park resources. Neither the appellant nor the agency disagrees.

## **Title Determination**

The authorized title for supervisory positions in this series is Supervisory Park Ranger. Neither the appellant nor the agency disagrees.

## Grade Determination

The position was evaluated by application of the criteria contained in the General Schedule Supervisory Guide (GSSG), which is a cross-series guide used to determine the grade level of supervisory positions in the General Schedule. The GSSG has six evaluation factors, each with several factor level definitions and corresponding point values. Positions are evaluated by crediting the points designated for the highest level met under each factor, and converting the total to a grade by using the grade conversion table provided in the guide.

The appellant contests the agency's evaluation of factors 1, 4, 5, and 6. We concur with the agency's evaluation of factors 2, 3, 4, 5, and 6, but disagree with their evaluation of factor 1.

### *Factor 1, Program Scope and Effect*

The agency credited Level 1-2 under this factor for both elements. The appellant believes that Level 1-3 should be credited, based on his responsibility for managing regional-level programs.

#### *Scope*

This element addresses the complexity and breadth of the program or program segment directed (below the agency level, this is the direct mission-related or line work of the organization); or the work directed, products produced, or services delivered (this pertains to administrative or other support-type functions). The geographic and organizational coverage of the program (or program segment) *within the agency structure* is included under this element.

At Level 1-2, the program segment or work directed is administrative, technical, complex clerical, or comparable in nature. The 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 illustrations provided in the guide at this level include:

- Providing an administrative or support service (e.g., budget, staffing, supply, maintenance, protective, library, or payroll services) to a small military base, a typical national park, or a moderately-sized nondefense agency field office. In this situation, the services provided directly impact other functions throughout the organizations supported and/or a small population of visitors or users.
- In a field office providing services to the general public, furnishing a portion of such services, often on a case basis, to a small population of clients. The size of the population serviced by the field office is the equivalent of all citizens or businesses in a portion of a small city.

The first illustration depicts internally-focused support work, i.e., where the work supervised constitutes services that are provided to support or facilitate the direct mission-related work of the organization itself. The second illustration depicts a program segment, where the work

supervised actually constitutes the essential purpose of the agency. The appellant supervises a program segment, in that [program] is one of the basic line functions of the bureau. Therefore, the first illustration is not applicable to his position.

At Level 1-3, the work directed is technical, administrative, protective, investigative, or professional in nature. Coverage of the work typically encompasses a major metropolitan area, a State, or a small region of several States; or, when most of an area's taxpayers or businesses are covered, coverage comparable to a small city. The illustrations provided in the guide at this level include:

- Directing design, oversight, and related services for the construction of complex facilities for one or more agencies at multiple sites. The facilities are essential to the field operations of one or more agencies throughout several States.
- In providing services directly to the general public, furnishing a significant portion of the agency's line program to a moderate-sized population of clients. The size of the population serviced is the equivalent of a group of citizens and/or businesses in several rural counties, a small city, or a portion of a larger metropolitan area. The serviced population may be concentrated in one specific geographic area or involve a significant portion of a multistate population.

The appellant is the chief of [program] for the [region], which is comprised of 13 parks in the immediate [city] metropolitan area. The [region] is one of the Service's seven regions, with the other six encompassing large multi-state areas of the country. Historically, it has been variously designated as the [organizational name] Region or the [organizational name] Field Area Office, although its general structure and functions and its position in the organizational hierarchy have remained constant through the changes in nomenclature.

The agency's rationale for assigning Level 1-2 under this element appears to be that because of the limited geographic coverage of the organization, its scope is more comparable to an "area office" as described at that level rather than a "major metropolitan area, a State, or a small region of several States" as described at Level 1-3. (The agency evaluation refers to the organization variously as a "field area office" and a "typical agency field office.") However, the purpose of the element "scope" as defined in the GSSG is to measure geographic and organizational coverage *as it affects "the general complexity and breadth" of the program directed*. Thus, the actual geographic area covered (in terms of acreage or square miles) is not in and of itself a determinant of program scope as that term is intended in the guide. For example, although Level 1-2 describes work of "limited geographic coverage," Level 1-3 allows for a broad range of geographic coverage ranging from "a major metropolitan area" to "a small region of several States." This underscores that the geographic subdivisions of an organization are usually a function of the complexity and breadth of the work conducted. For example, a very large geographic region may encompass a few limited and widely dispersed activities, or conversely, a small area may encompass many varied, intensive, or high impact activities.

Given these considerations, the [region] is more aligned with Level 1-3 scope than with the "typical agency field office" or "area office" represented at Level 1-2. A field office is the

lowest organizational unit within an agency structure. An area office (in those agencies with these geographic subdivisions) is normally the third level of organization, under the national and regional office levels. The [region], in terms of its programmatic responsibilities, management structure, and placement in the organizational hierarchy, functions in the same manner as the other six NPS regions. Like the other regional offices, it is headed by an SES official who reports to the NPS director and is organized by directorates for the major agency mission functions. The appellant's division likewise mirrors the counterpart divisions in the other regions, with common responsibilities and designated staff for a range of traditional ranger functions. Although the geographic area is compressed, it includes many sites and monuments of extreme historical and cultural significance, subject to a high level of and public and political scrutiny (these being the considerations upon which its regional status is based). The limited size of the area obviously results in some programmatic disparities between the [region] and the other regions (e.g., staffing levels, budgets, number of field units). However, the intent of this factor is not to evaluate a given position *relative to* other similarly situated positions in the organization. (The difference in magnitude of the various regional programs would be reflected in factors 5 and 6.) The scope of the appellant's work *within the agency structure*, from both an organizational and management standpoint, is clearly comparable to a "major metropolitan area" or a "small region" as described at Level 1-3. It aligns with the second illustration under that level, in that the appellant's division provides a significant portion of the agency's line program to a substantial population of park visitors and users within a specific metropolitan area.

### *Effect*

This element addresses the impact of the work on the mission and programs of the customers, the activity, the agency, other agencies, the general public, or others.

At Level 1-2, the services support and significantly affect installation level, area office level, or field office level operations; 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.

At Level 1-3, the services directly and significantly impact a wide range of agency activities, the work of other agencies, the operations of outside interests, or the general public.

The Level 1-2 criteria addresses two different scenarios, i.e., positions involved in the provision of support services internal to an organization (where effect is on installation level, area office level, or field office level operations), and positions involved in the delivery of externally-oriented, line functions within a designated geographic area (where effect is on a moderate, local, or limited population of clients or users). The agency assigned Level 1-2 under this element, stating that "the services provided by the appellant support the program activities of the [organizational name] Area field office of the NPS." The agency evaluation then continues in this vein, stating that "supporting services would have to be conducted throughout, or cover the operations of, the agency's headquarters or most of its field establishment in order to affect the agency's national goals and objectives." (These criteria are actually paraphrased from Level 1-4 and are therefore not relevant here.) Regardless, the criteria *are not applicable* to the appellant's position because his organization is not involved in the provision of internal support services to the organization, but rather in the conduct of *the basic mission functions of the agency*. As such,

Level 1-2 is clearly exceeded, considering that the “population of clients or users,” in this case the visitors to the park units under [region] jurisdiction, far exceeds the small to moderate local population described at that level.

In terms of Level 1-3, the appellant’s organization does not *directly and significantly* impact a wide range of agency activities or the work of other agencies. It does have this degree of impact, however, on the operations of outside interests and the general public. Given that the organization constitutes the core mission functions of the agency, i.e., public safety and the protection of the natural and historic resources under the region’s jurisdiction, the conduct of these functions requires direct and significant interaction with the public and outside groups. Any number of examples can be cited, including the law enforcement function, the issuance or denial of permits for demonstrations, the operation of the reservation system for the [site] and other sites, coordination of area youth programs, and other activities that have a direct impact on the public’s use and enjoyment of park resources. Given the visitation levels to these sites and the consideration that these are premier tourist attractions nationwide and worldwide, impact extends beyond the local interests typical of Level 1-2 to the broader general public.

Level 1-3 is credited.

550 points

#### *Factor 2, Organizational Setting*

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

The appellant’s supervisory chain consists of the Associate Regional Director for [programs] (GS-15), Deputy Regional Director (GS-15), and Regional Director (SES). Thus, he reports to a position that is two levels below the first SES position in the direct supervisory chain.

Level 2-1 is credited.

100 points

#### *Factor 3, Supervisory and Managerial Authority Exercised*

This factor covers the delegated supervisory and managerial authorities that are exercised on a recurring basis. The agency credited Level 3-3 under this factor, citing both paragraphs a and b.

Level 3-3a involves exercising delegated managerial authority to set a series of annual, multiyear, or similar types of long-range work plans and schedules for in-service or contracted work; assuring implementation (by lower and subordinate units) of the goals and objectives for the program segment; determining goals and objectives that need additional emphasis; determining the best approach for resolving budget shortages; and planning for long-range staffing needs, including such matters as whether to contract out work. These positions are closely involved with high level program officials (or comparable agency level staff personnel) in the development of overall goals and objectives for the program segment.

The GSSG is used to evaluate the supervisory responsibilities of positions, and the managerial responsibilities that may *accompany* those supervisory responsibilities. In other words, the

managerial responsibilities must be performed in relation to a subordinate workforce over which the position has both administrative and technical supervision. (This basic coverage requirement is clarified in exclusion #3 of the GSSG, which excludes positions with program management responsibility as opposed to direct supervision.) Similarly, the appellant is engaged in some delegated functions and authorities typical of Level 3-3a, such as developing multi-year plans and schedules for regional initiatives and assuring the implementation of goals and objectives by the parks under [region] jurisdiction. However, these authorities are performed within the context of program management rather than direct supervisory functions. The appellant is not delegated line supervisory or managerial authority over the park units implementing the objectives and initiatives. Because they are not in the appellant's direct chain of command, these "subordinate organizational units" do not reflect the exercise of direct managerial authority found at Level 3-3a, and that paragraph is therefore not creditable.

To meet Level 3-3b, a position must exercise all or nearly all of the delegated authorities and responsibilities described at Level 3-2c and, in addition, at least eight of the 15 responsibilities listed at Level 3-3b. The agency credited this level without specifying the responsibilities met. We found that the position fully meets Level 3-2c, which describes such typical supervisory duties as planning and assigning work, evaluating performance, interviewing job applicants, and effecting discipline. Our analysis of the responsibilities listed at Level 3-3b follows:

Responsibility 1 is credited. It involves serving as a second-level supervisor, i.e., using subordinate supervisors or team leaders to direct, coordinate, or oversee work. The appellant has two subordinate supervisors, the Fire and Emergency Program Manager, GS-401-12, and a Captain, SP-083-7, who heads a small resource crime investigative unit. With a total subordinate staff of only 13 employees, it would not ordinarily be expected that subordinate supervisors would be required to accomplish the work of the organization. However, in this case the two subordinate supervisors acquired their staffs as a result of the expansion of their respective programs. The GS-401-12 had been previously designated as the program manager for the regional fire program, and the grade of the position was predicated on that responsibility. Three additional positions were added to this program area to support the service's new wildland and structural fire initiatives and were placed under the direction of the GS-401-12, who was already responsible for regional oversight and coordination of the program. The SP-083-7 (Captain, Park Police) was likewise a pre-existing position designated as the regional law enforcement specialist. That individual serves as the regional authority on matters dealing with criminal investigations (i.e., the day-to-day operations of the regional law enforcement program as opposed to a more staff-oriented, program coordinative and evaluative role.) The position requires extensive experience in operating-level law enforcement. Three investigators, SP-083-2/3, were assigned to the organization (as the first in an intended series of long-term, rotating details) to provide dedicated operational support on resource crimes, and were placed under the Captain's direction as a natural extension of his existing responsibilities. Given these considerations, the subordinate staff structure is appropriate from an organizational standpoint and supports crediting of this responsibility.

Responsibility 2 is credited. It involves exercising significant responsibilities in dealing with officials of other units or organizations, or in advising management officials of higher rank. As



the regional chief ranger, the appellant has a significant coordinative and advisory role, both internal and external.

Responsibility 3 is credited. It involves assuring reasonable equity (among units, groups, teams, projects, etc.) of performance standards and rating techniques developed by subordinates. Although this is not a particularly complicated task given the size of the subordinate staff, it is performed as part of the regular rating cycle as it would be if the staff were much larger.

Responsibility 4 is not credited. It involves direction of a program or major program segment with significant resources (e.g., one at a multimillion dollar level of annual resources). The appellant exercises *direct* control over his division budget, which is \$2.3 million. This falls short of the *multimillion* dollar level, which indicates an expectation of a several million dollar resource level.

Responsibilities 5 and 6 are credited. They involve duties inherent to the second-level supervisory role, including making decisions on work problems presented by subordinate supervisors, evaluating subordinate supervisors, and serving as reviewing official on evaluations of nonsupervisory employees.

Responsibilities 7 and 8 are credited. They involve making or approving selections for nonsupervisory positions, and recommending selections for subordinate supervisory positions. The appellant makes final selections for the positions on his staff, with the exception that he provides input on the selection for the SP-7 Captain position, which is made by the Park Police as an internal promotion opportunity.

Responsibilities 9, 10, and 11 are not credited. They involve significant authority to hear and *resolve* group grievances or serious employee complaints, review and *approve* serious disciplinary actions (e.g., suspensions), and make *decisions* on nonroutine, costly, or controversial training requests for employees of the unit. In order to be credited, these authorities must be exercised on a regular and recurring basis. The appellant does not have final approval authority for these types of administrative actions, nor is his organization of sufficient size that these issues would be expected to arise on a relatively frequent basis.

Responsibility 12 is not credited. It involves determining whether contractor performed work meets standards of adequacy necessary for authorization of payment. One of the appellant's subordinates is designated as the Contracting Officer's Technical Representative on the conduct of environmental site assessments and remediations. The appellant's input is limited.

Responsibility 13 is credited. It involves approving expenses *comparable to* within-grades, extensive overtime, and employee travel. The appellant has approval authority for within-grade increases and career-ladder promotions. Although there is minimal requirement for either travel or extensive overtime by his own staff, the appellant controls the dispatch of park personnel outside the region, e.g., travel and per diem expenses for park firefighters on temporary duty assignments.

Responsibility 14 is credited. It involves recommending awards for nonsupervisory personnel and changes in position classification subject to higher-level approval. The appellant does this.

Responsibility 15 is not credited. It involves finding and implementing ways to eliminate or reduce significant bottlenecks and barriers to production, promote team building, or improve business practices (e.g., a large production or processing unit). This would apply to large organizations whose missions would be susceptible to the application of such methodological or structural improvements. The appellant supervises a small staff engaged in discrete program functions that would not lend itself to these types of management applications.

Since the position can be credited with nine of the listed responsibilities, it meets Level 3-3b.

Level 3-3b is credited.

775 points

#### *Factor 4, Personal Contacts*

This is a two-part factor which assesses the nature and purpose of the personal contacts related to supervisory and managerial responsibilities. The nature of the contacts, credited under subfactor 4A, and the purpose of those contacts, credited under subfactor 4B, must be based on the same contacts.

##### *Subfactor 4A, Nature of Contacts*

This subfactor covers the organizational relationships, authority or influence level, setting, and difficulty of preparation associated with the personal contacts.

The agency credited Level 4A-3 under this subfactor. The appellant believes that Level 4A-4 should be credited.

The appellant's contacts meet Level 4A-3, which describes frequent contacts with, for example, high ranking managers at bureau and major organization levels of the agency or comparable personnel in other Federal agencies; key staff of public interest groups with significant political influence or media coverage; journalists representing influential city newspapers; congressional committee staff assistants; contracting officials and high level technical staff of large industrial firms; and/or State and local government managers doing business with the agency. These contacts take place in meetings and conferences and often require extensive preparation of briefing materials or up-to-date familiarity with complex subject matter. The appellant has frequent contacts with program managers at the NPS headquarters level and at other Federal law enforcement and regulatory agencies. These contacts often take place in meetings where the appellant is an active participant in providing briefings or in coordinating activities.

Level 4A-4 is not met, which describes frequent contacts with executive level contracting and other officials of major defense contractors or national officers of employee organizations; regional or national officers of trade associations, public action groups, or professional organizations of national stature; key staff of congressional committees and principal assistants to senators and representatives; elected or appointed representatives of State and local

governments; journalists of major metropolitan or national newspapers; and/or SES or Executive Level heads of bureaus and higher level organizations in other Federal agencies.

The appellant claims that several of his program areas have increased in visibility and are attracting more attention from senior government officials, and that he has met with reporters from the [city] Post, [city] Times, Journal newspapers, and local television news. However, he does not meet with the *directors* of other Federal bureaus or Departments, and his contacts with major media outlets like the [city] Post are infrequent. Basically, his regular and recurring contacts are indicative of Level 4A-3. His position is not high enough in the organizational hierarchy that he would be authorized or expected to routinely have the types of high-level contacts described at Level 4A-4. Dealings of this nature would ordinarily be referred to others at higher levels in the organization, e.g., the Associate or Regional Director, or headquarters-level public affairs or congressional liaison staff.

Level 4A-3 is credited.

75 points

*Subfactor 4B, Purpose of Contacts*

This subfactor covers the purpose of the personal contacts credited under subfactor 4A, including the advisory, representational, negotiating, and commitment making responsibilities.

The agency credited Level 4B-3 under this subfactor. The appellant believes that Level 4B-4 should be credited, citing his actions in overcoming internal opposition to program proposals.

The purpose of the appellant's contacts are consistent with Level 4B-3, where the purpose of the contacts is to justify, defend, or negotiate in representing the program segment or unit directed, in obtaining or committing resources, *and* in gaining compliance with policies, regulations, or contracts. These contacts usually involve active participation in conferences, meetings, and hearings involving problems or issues of considerable consequence or importance to the program managed. Corresponding examples of the appellant's work include negotiating jurisdictional agreements with local law enforcement agencies, justifying resource requests to higher-level management, convincing the U.S. Attorney's Office of the strengths of particular cases they would like to have prosecuted, attempting to gain compliance with environmental laws by violators, committing park staff to assist on special initiatives, among others.

Level 4B-4 is not met, where the purpose is to influence, motivate, or persuade persons or groups to accept opinions or take actions related to advancing the fundamental goals and objectives of the program or segments directed, or involving the commitment or distribution of major resources, when intense opposition or resistance is encountered due to significant organizational or philosophical conflict, competing objectives, major resource limitations or reductions, or comparable issues. The opposition described at this level would normally be externally-generated, since internal conflicts would rarely involve matters relating to the fundamental objectives of the program. The appellant's internal contacts do not involve this degree either of conflict or resource commitment.

Level 4B-3 is credited.

100 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. It involves determining the highest grade of basic (mission-oriented) nonsupervisory work performed that constitutes 25 percent or more of the workload of the organization. Among the types of work excluded from consideration are work for which the supervisor does not have the minimum supervisory and managerial authorities defined under Factor 3 (including such basic administrative supervisory functions as approving leave and evaluating performance), and lower-level support work that primarily facilitates the basic work of the unit.

The agency credited Level 5-7 under this factor, identifying GS-12 as the base level work of the unit. The appellant contends that the GS equivalency for the subordinate SP-7 (U.S. Park Police Captain) position should be GS-13 rather than GS-12. He also cites that another GS-12 subordinate (the regional fire and emergency management manager) has a classification appeal pending with the agency for upgrade to GS-13.

The staff years of nonsupervisory work under the appellant's direction are listed below. Excluded from consideration are a GS-303-7 support position, and a GS-025-11 who coordinates the region's emergency medical services program on a part-time basis but is administratively assigned to one of the parks.

<u>Staff Years</u>	<u>Corresponding Positions</u>
1	Environmental Protection Specialist, GS-12
3	Park Rangers, GS-12
1	Fire Protection Specialist, GS-12
1	Natural Resource Specialist, GS-11
1	Investigator, SP-3
2	Investigators, SP-2

In addition, the appellant has two subordinate supervisory positions on his staff, a GS-12 Supervisory Natural Resource Specialist and the SP-7 referenced above. The GS-12 position description indicates that supervisory work constitutes 30-40 percent of the position. This information is not specified in the SP-7 position description. The supervisory workloads of these two positions must be excluded from consideration under this factor, and only that portion of their workload that constitutes nonsupervisory work can be credited. Assuming that the SP-7 spends no more than the minimum 25 percent of the time on supervisory duties, there may be up to an additional 1.5 staff years of nonsupervisory GS-12 work under the appellant's direction.

Given a total of approximately 10.5 staff years of creditable nonsupervisory work in the unit, the grade identified as the base level would have to constitute approximately 2.5 staff years to meet

the 25 percent requirement. Based on the current grade structure, there are approximately 6.5 staff years of nonsupervisory GS-12 work in the unit, or about 60 percent of the total nonsupervisory work of the unit. Even if the GS-12 fire and emergency management position were upgraded to GS-13, and the SP-7 position were credited as equivalent to GS-13, they would constitute less than two staff years of nonsupervisory GS-13 work, after excluding the supervisory work performed.

The agency determined the GS grade equivalency for the SP-7 position based on a conversion chart prepared by the bureau in 1975. However, this is not an appropriate method for determining the grade equivalency of supervised work. The GSSG instructs that, "In the assessment of the level of any work performed by non-General Schedule employees, the pertinent classification standards should be consulted to derive an appropriate GS equivalent." A generic grade conversion would not necessarily result in the correct grade level for the work actually being performed. However, for purposes of this evaluation, this is a moot point since the 25 percent requirement would not be met regardless of the SP-7 grade equivalency.

Level 5-7 is credited.

930 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 *difficulty* of work is measured primarily by the grade level of work credited under Factor 5. *Complexity* is measured by the level of coordination required.

The agency credited Level 6-4 under this factor. The appellant believes Level 6-5 should be credited, citing that he serves on the Multi-Region Coordinating Group and that he coordinates regional law enforcement resources with the U.S. Park Police when necessary (e.g., demonstrations, checkpoints, large special events.)

At Level 6-5, supervision requires significant and extensive coordination and integration of a number of important projects or program segments of professional, scientific, technical, or administrative work comparable in difficulty to the GS-12 level. *In addition*, supervision at this level involves major recommendations that have a direct and substantial effect on the organization and projects managed. For instance, the supervisor makes major recommendations in at least three of the following or comparable areas: significant internal and external policy areas affecting the overall organization; restructuring, reorienting, and recasting immediate and long-range goals, objectives, plans, and schedules to meet substantial changes in legislation, program authority, or funding; determinations of projects or program segments to be initiated or curtailed; changes in organizational structure; the optimum mix of reduced operating costs and assurance of program effectiveness; the resources to devote to particular programs (especially when staff-years and a significant portion of the budget are involved); and policy formulation and long range planning in connection with prospective changes in functions and programs.

The *difficulty* of the work supervised by the appellant is indicative of Level 6-5, in that GS-12 represents the base grade level of the major functional subdivisions of the program. However,

the *complexity* inherent to work at this level requires making major recommendations in at least three of the listed categories, including program and policy issues, goals and objectives, program content, organizational structure, cost reduction, resource allocation (when a significant portion of the budget is involved), and policy formulation. Although the appellant has input to some of these areas, particularly program and policy issues, his unit's organizational placement limits the degree to which he can *formulate* policy or *determine* overall program objectives or components, and its size does not permit much flexibility in organizational design or resource distribution. Therefore, Level 6-4 is assigned, where coordination involves such work as identifying internal and external program issues affecting the immediate organization; recommending resources to devote to particular projects or to allocate among program segments; or reviewing reports, decisions, case documents, or other action documents to assure that they reflect the policies and position of the organization and the views of the agency.

Level 6-4 is credited.

1120 points

### *Summary*

<u>Factors</u>	<u>Level</u>	<u>Points</u>
Program Scope and Effect	1-3	550
Organizational Setting	2-1	100
Supervisory/Managerial Authority	3-3b	775
Personal Contacts		
Nature of Contacts	4A-3	75
Purpose of Contacts	4B-3	100
Difficulty of Work Directed	5-7	930
Other Conditions	6-4	<u>1120</u>
Total		3650

The total of 3650 points falls within the GS-14 range (3605-4050) on the grade conversion table provided in the GSSG.

### **Other Issues**

The appellant's position minimally meets the GS-14 level under the GSSG, based on a subordinate staff structure that barely qualifies his position as a second-level supervisor. The position is one of the seven regional chief ranger positions, all of the others of which are classified at the GS-14 level. Within the [region], the park chief ranger positions range in grade from GS-11 level (one position) to GS-14 (one position), with the remainder at GS-12 and GS-13. The appellant's immediate supervisor is a GS-15. The appellant has the same functional responsibilities as his regional counterparts, albeit for a more compressed geographic area. He represents the region on the Ranger Activities Council and the Regional Protection Program Managers group, equal to the other regional chief rangers. Although his programs may be of comparatively lesser breadth and complexity in some respects, they also present unique demands that arise from the highly politicized environment in which they operate.

Alignment, in and of itself, is not a basis for classifying a supervisory position. It is, however, referenced under factor 5 as a consideration when determining the base level for second-level (and higher) supervisors over large workloads. Within that context, the GSSG recognizes alignment as an element in determining which of two methods to use in the base level determination. Although this does not apply to the appellant's position, it does introduce the alignment concept as a legitimate consideration in certain limited situations.

In the appellant's case, alignment was considered only to the extent that it corroborates classification of the position at the GS-14 level. The addition of a few more positions to his staff would strengthen the grade by solidifying the assignment of Level 3-3b under factor 3, but this would not significantly increase the basic responsibilities and demands of the work. It would impose an artificial requirement on the position that bears no relation to the actual difficulties encountered in the job. The criteria at that level do not specify staff size, and although general classification principles relating to the regularity of duties performed apply, they must be considered within the broader context within which the given position operates. In this case, the organizational environment is such that alignment has somewhat more relevance than it otherwise might. The bureau has only seven regional subdivisions and tends to be decentralized in the sense that considerable latitude is afforded the regional offices in their respective program operations. Further, regional staff are expected to provide significant input to policy and program development matters and are periodically assigned to bureau-level task forces for special initiatives. The appellant participates equally in these responsibilities with his regional counterparts. Thus, this is not a situation where the work is isolated or self-contained, where individual differences among counterpart positions would have a greater influence on the comparative difficulty of the jobs. Given these considerations, alignment with other properly graded counterpart positions in this particular case provides additional support for the grade derived through application of the GSSG.

### **Decision**

The appealed position is properly classified as Supervisory Park Ranger, GS-025-14.