

U.S. Office of Personnel Management  
Division for Human Capital Leadership & Merit System Accountability  
Classification Appeals Program

Philadelphia Field Services Group  
600 Arch Street, Room 3400  
Philadelphia, PA 19106-1596

**Classification Appeal Decision**  
**Under section 5112 of title 5, United States Code**

**Appellant:** [appellant's name]

**Agency classification:** Historian  
GS-170-13

**Organization:** [organizational names]  
Associate Director for Cultural  
Resources  
National Park Service  
U.S. Department of the Interior  
[location]

**OPM decision:** Historian  
GS-170-13

**OPM decision number:** C-0170-13-01

/s/

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Marta Brito Pérez  
Associate Director  
Human Capital Leadership  
and Merit System Accountability

August 24, 2004

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Date

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

**Decision sent to:**

[appellant's name and address]

Acting Assistant Director  
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U.S. Department of the Interior  
National Park Service  
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1849 C Street, NW.  
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## **Introduction**

On April 8, 2004, the Philadelphia Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant's name]. The appellant's position is currently classified as Historian, GS-170-13. She believes that her position should be classified at the GS-14 grade level. We received the agency appeal administrative report on May 7, 2004, and the appellant's comments on the report on May 14. The position is in the [organizational information], Associate Director for Cultural Resources, National Park Service (NPS), U.S. Department of the Interior (DOI), in Washington, DC. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

## **General issues**

The appellant's appeal rationale identifies her position as that of NPS's "Bureau Historian." In her response to the agency appeal administrative report, the appellant states that "in 1980 Service leaders created the Bureau Historian position, as a GS-14 Historian position, to document and write the history of the agency and to manage an agency wide administrative history program." By law, we must classify positions solely by comparing their current duties and responsibilities to OPM PCS's and guidelines (5 U.S.C. 5106, 5107, and 5112). Other methods or factors of evaluation are not authorized for use in determining the classification of a position, such as comparison to positions that may or may not have been properly classified, e.g., the 1980 GS-14 Historian position.

## **Position information**

Both the appellant and her supervisor have certified the accuracy of the position description (PD) of record (PD # [number]).

The PD contains more than one page of major duties. They include serving as the NPS's leading authority and advisor on matters relating to NPS's history, both internally and to Congress; planning, programming, and promoting a historical research program for the history of the NPS; preparing, or arranging for the preparation of, special monographs and studies dealing with the history of the NPS which may involve programs of more than one department or agency, professional subjects of great variety, and political, economic, ethnic, and religious matters of great complexity; and serving as coordinator of the NPS oral history program, including conducting oral interviews with current and former NPS administrators. Other duties listed include providing professional assistance, support and guidance to regional and park historians who prepare administrative histories of parks, monitoring their work, and evaluating drafts of studies as they near completion; preparing annual and special reports concerning the NPS's operations, as requested; coordinating the preparation of, monitoring, and utilizing regional directors' and superintendents' annual reports; and working with the Chief Curator and the curator of the NPS's historical collection at Harpers Ferry on the preservation and use of records and memorabilia in that office.

The PD describes other duties including monitoring legislation affecting the expansion of the National Park System; evaluating and reviewing special studies on proposals for adding new areas to the National Park System and advising the Chief Historian on the proposed sites

potential for meeting NPS criteria of national significance, integrity, suitability, and feasibility; participating in professional functions including publishing research; maintaining close contact with colleges and universities in order to secure cooperation and assistance from faculty and qualified students in preparing studies relating to the history of the NPS; and in cooperation with the NPS Records Officer, promoting and coordinating proper records management, retention, and disposition with the NPS. Other duties include providing historical judgments for use by the Chief Historian, Directorate, or Secretary on short notice; and replying to Congressional White House, Secretarial, Directorate and public correspondence on subjects relating to history and historic preservation aspects of NPS programs, policies, and activities.

The record shows, however, that some of the duties listed are performed intermittently and occupy a limited amount of the appellant's time, e.g., evaluating special resource studies on proposals for adding new areas to the National Park System. The preponderance of the appellant's work involves the NPS administrative history program and closely related functions, e.g., oral history policies and practices.

We conducted a telephone audit with the appellant and a telephone interview with her immediate supervisor. Based on the audit and interview findings and all information of record furnished by the appellant and her agency, we find that the PD of record contains the duties and responsibilities performed by the appellant and we incorporate it by reference into this decision.

### **Series, title and standard determination**

The agency classified the position in the History Series, GS-170, with the title Historian, and graded it by application of the History Series, GS-170 PCS. The appellant did not contest these determinations. Based on careful review of the record, we concur with the series and title determination and the use of the GS-170 PCS to grade the position. We will apply the Community Planning Series, GS-020 PCS to further address the appellant's staff functions in planning or providing policy direction, guidance, and review of historical programs. The GS-020 PCS covers professional work involving community planning and with developing the art and science of community planning. It provides grading criteria that cover operational, advisory, and program management work.

### **Grade determination**

#### *Evaluation using the GS-170 PCS*

The GS-170 PCS uses two classification factors for grade determination: *Nature of the assignment* and *Degree of responsibility*. They serve to provide both the framework within which the occupation is structured and specifically applicable criteria for the evaluation of levels of work.

#### *Nature of the assignment*

This factor includes the scope and complexity of the assignment, the knowledge and skills that must be used to complete the assignment, and the mental demands involved. The scope of historical project planning and research assignments is influenced by such considerations as the

breadth and number of topics and sub-topics involved, the period of time to be covered, and the depth to which the subject is to be studied. Measures of the complexity of research assignments include (1) the relative availability and reliability of source materials, (2) the difficulties involved in establishing historical facts and in determining their relative importance and relationships, and (3) the difficulties which must be overcome in the presentation of the results of historical study.

At the GS-13 grade level, assignments embrace broad and varied subject matters and involve a substantial number of considerations. Illustrations provided include: (1) a study of all significant aspects of a major program such as a ballistic missile program, or a program to develop nuclear-powered flight, taking into account the inter- and intra-agency relationships involved and their influence on policy, planning, programming, research, development and similar matters, the problems encountered in the development of the program, the alternatives considered in the development of solutions, the basis for the selection of one solution as opposed to the alternatives, and the impact of such decisions on the program; (2) a study of the multilateral foreign relations of the United States during a specified time period, taking into account the nature of the relationships existing among the countries involved at the beginning of the time period, the intra- and inter-national economic, political and military situations and other considerations which influenced the evolution of foreign policy and shaped the nature of the multilateral relationships existing at the end of the time period represented by the study; (3) a study of the bilateral foreign relations of the United States with another country in a case where those regulations were unusually complex or difficult, with particular emphasis on the reasons for the position taken by the United States with respect to the problems under study or negotiation; (4) the planning and carrying out of a series of definitive historical studies relating to historic sites and the providing of historical judgments of a high order as to which sites are of national historical significance and eligible for National Historic Landmark status or for inclusion (or proposed inclusion) within the National Park System in a major geographic area. Such studies typically include a variety of fields of history, e.g., military, political, economic, cultural, and a range of historical periods, e.g., colonial, Federal, Civil War, etc., and are to be used as the basis for the planning and development of the regional program for the acquisition, preservation, restoration, reconstruction and interpretation to the public of those physical evidences of major significance to the national historical heritage which are located within the confines of the region; or (5) the planning and conducting of a series of studies of the type described in (4) preceding, to be used as the basis for both the near-term and the long-range development of a national historical park of outstanding historical significance.

In addition to problems of the kind described at the GS-12 grade level, GS-13 grade level assignments present major planning problems and frequently are defined only in terms of broad topics or areas to be covered. Within this framework, GS-13 historians employ a highly specialized knowledge of the subject-matter areas involved and a thorough understanding of the purposes to be served in developing definitions of the perimeters of the study, and in making determinations regarding those aspects of the assignment to be given particular emphasis. They develop all phases of the working plan, taking into account the time available for the accomplishment of the project and the number and experience level of the historians available for service as “team” members if the project is susceptible to a “team” approach. Special studies requested for use in policy and program planning activities frequently must be completed within stringent deadlines, thus requiring the historian to tailor the project plan

accordingly, but without sacrifice of depth of coverage of essential elements, or quality of historical synthesis and presentation.

Typically, assignments of the type described above require the historian to employ a high degree of imagination and ingenuity in the location of obscure source materials. Problems of the kinds described at lower levels in the evaluation of evidence and the establishment of historical fact are common. The range of subject matter involved and the involved interrelationships of historical facts present major problems and require substantial critical judgment in the development and presentation of the historical study. In addition to the knowledge described at the GS-12 grade level, GS-13 historians are required to employ substantial breadth and depth of knowledge of the specialized subject areas involved, in evolving and testing hypotheses to clarify complex and often obscure casual relationships. Problems in presentation are heightened by the necessity to present, either in narrative form or through the medium of selected official documents, an objective, comprehensive picture of the subject under consideration which clearly establishes the relative values and importance of the many and varied historical facts involved.

In contrast, the scope and importance of GS-14 assignments are illustrated by: (1) a study to be used as background material for high-level military policy deliberations on a subject of international significance involving such considerations as the strategic determinations and policy recommendations of the Joint Chiefs of Staff, the deliberations of the National Security Council, the foreign aid and military assistance operations of various agencies of the Department of Defense and their representatives in the field, the negotiating activities of the Secretary of State, and the internal political situations and foreign and military policies of other nations; (2) a study of similar scope to be used as background material for foreign policy deliberations on matters of major international importance; (3) a history of the significant aspects of the overall operations of a major component of the Departments of the Army, Navy or Air Force such as a history of a Naval Bureau, a major Air Command or an Army Technical Service for a specified time period; (4) definitive studies for official publication, when such studies represent the scope and complexity described in (1) through (3) above; or (5) the planning and carrying out of a series of definitive historical studies relating to sites of major national historical significance included, or proposed for inclusion, within the National Historical Park System. Such studies typically include a variety of fields of history, e.g., military, political, economic and cultural within one or more major historical periods, e.g., colonial, Federal, Civil War, etc., and serve as the basis for planning, developing and carrying out a nationwide program for the acquisition, preservation, restoration, reconstruction and interpretation to the public of sites and events of major significance to the national historical heritage.

GS-14 historians may be assigned individual or collaborative projects, or may function as "team" leaders. Their assignments present the full range of planning, research, analysis, synthesis and presentation problems described at the GS-13 grade level, and such problems are intensified by the broader scope or greater complexity of the subject matter involved. In addition to an authoritative knowledge of specialized subject-matter areas and a broad historical outlook based on wide knowledge of various historical fields, GS-14 historians frequently are required to visualize and anticipate management's requirements for historical information for both current and long-range program planning and policy deliberations and to tailor the scope

and emphasis of their studies for most effective use by management in making important program and policy decisions.

The appellant points to the third GS-14 grade level illustration in the PCS as closely parallel to her current duties and responsibilities. She also believes that her ongoing responsibility as the only historian in NPS with primary responsibility for the administrative history program is GS-14 grade level work. This involves establishing and maintaining professional standards for the program; developing, publishing, and issuing NPS-wide procedures and guidelines for the program; providing technical leadership, and guidance on administrative histories produced in the nearly 400 park units; and managing the program budget. The appellant says that she has drafted an NPS policy directive on oral history. She states that her reports and studies address significant historical events and issues in NPS's history and that she has independently planned and carried out a number of definitive historical studies related to the history of the NPS. The appellant says that these studies address diverse and thorny issues which are generally more complex and challenging than histories of individual historic sites or special resource studies. The appellant states that her work directly supports the needs and requirements of senior managers in both the NPS and DOI, e.g., conducting archival research and providing historical background for the DOI solicitor's office on a major piece of legislation to support a pending court case and providing the Secretary of the Interior information about NPS during World War II. As evidence of visualizing and anticipating management's requirements for both current and long-range program planning and policy deliberations, she cites her study of how NPS responded to the 9/11 attacks which addresses planning and policy-making at the highest levels as well as operations at the park, regional, and national levels, and which includes a critical analysis of the NPS's response capability, as well as the diverse issues of natural and cultural resource protection, security, funding, and communications that provides managers with the detailed narrative and critical analysis they need to improve the NPS's response to similar events in the future. She also points to drafting the first Director's Order to establish NPS-wide policy for oral history and her handbook on oral history. The appellant also points to the wildland fire management history project that she is managing which will provide the historical context for leaders with NPS and other agencies who have fire management responsibilities and will serve as a valuable tool in future fire response planning.

The illustration cited by the appellant relates to her primary area of responsibility--administrative history. However, the primary consideration in this standard is not whether a given position matches any of the examples provided at a particular grade level, but rather the degree to which the position embodies the grade-level concepts presented therein. This intent of this illustration and the other illustrations at the GS-14 grade level is to convey the substantially greater depth, and scope of assignments typical of the GS-13 grade level. Major projects cited by the appellant, i.e., the 9/11 and wildland fire projects, are comparable to work described in the first GS-13 grade level illustration. As at that grade level, the wildland fire study focuses on all significant aspects of a major program that must take into account inter- and intra-agency relationships involved in their influence on policy, planning programming, and similar matters, the problems encountered in the development and management of that important program, the development of program policy, and how those myriad decisions have affected the wildland fire management program from 1872 to the present. Similarly, the 9/11 history looks at a critical event and how the NPS responded to the attacks and their aftermath, focusing on the lessons learned and future actions to take to improve NPS policies and

practices. Conceptualizing and overseeing the wildland fire study, and planning and conducting the 9/11 history both involved the major planning problems typical of the GS-13 grade level. As at that level, these projects were only defined in terms of the broad topics to be covered and, based on a thorough knowledge of the purposes to be served, she independently determined the approaches to be taken. Typical of the GS-13 grade level, these projects involved the range of subject matter and interrelationships of historical facts that present problems and require the exercise of critical judgment in developing and presenting the studies. For example, the 9/11 study involved meshing oral histories conducted by the appellant and separately by other NPS organizations with daily reports and other documentary evidence to produce a clear narrative and assessment of how the NPS responded to the tragedy, identify the lessons learned based on internal functional reviews conducted by some program managers and her independent assessment of all information gathered.

The administrative history example at the GS-14 grade level must be interpreted within the context of the defined GS-14 grade-level concepts. The standard states that the organizational echelon at which a position is located cannot be used as an automatic measure of the scope and complexity of the work or the level of responsibility of the historian. The cited example describes conducting a single, complete history of the significant aspects of the **overall operations** (emphasis added) of a major component of the Departments of the Army, Navy, or Air Force such as a history of a Naval Bureau, a major Air Command or an Army Technical Service for a specific period of time. The major agency components in this example are the equivalent of Bureaus and Services, like the Park Service, in civilian agencies and departments. Their histories are complicated by the fact that their functions frequently are interwoven with other Bureau-equivalent organizations both within and outside their own department and may extend to and include major activities with foreign governments. It is these complicating aspects of work that broaden the scope of work and the complexity of the subject matter at issue as defined at the GS-14 grade level. The appellant's short notice support to the Secretary of the Interior on Park Service on NPS operations during World War II (balancing natural resource protection with support of the war effort) and other examples that she provided do not constitute the type of in-depth studies used to formulate important program and policy decisions defined at the GS-14 grade level. While the appellant provides program and policy guidance on administrative history, she is not tasked with writing histories of the significant aspects of **overall** NPS operations for major periods of time as intended by the illustration. As discussed in the rationale that she presented, responsibility for NPS administrative history is decentralized. Therefore, this example is not comparable to the appellant's administrative history duties and responsibilities.

As discussed in Notes To Users Of This Standard, the grading criteria in the PCS does not describe criteria for the evaluation of historian positions that operate in a staff capacity in planning or providing policy direction, guidance, and review of historical programs which constitute a large part of the appellant's duties and responsibilities. However, the PCS states that the criteria provided can be used as a general classification guide for professional historian positions. The appellant's administrative history program duties, including her contracting officer's technical representative (COTR) and budgetary responsibilities, compare closely with program planning responsibilities described at the GS-13 grade level. Although the appellant exercises substantial program planning responsibility, e.g., suggesting a major update of the oral history handbook and developing an oral history program instruction, her supervisor



retains the program planning and policy functions envisioned at the GS-14 grade level; i.e., anticipating management's requirements for program planning and policy deliberations and **deciding** on the scope and emphasis of each study and the structure and goals of the programs under his control. Although the appellant recommends studies to be conducted, she also receives topics to study from her supervisor. For example, while the appellant began to conduct oral histories on 9/11 on her own, her supervisor was fully involved in the decision to develop the formal proposal to conduct the 9/11 project for approval by the Associate Director. The wildland fire project was an initiative started by the appellant's supervisor. Therefore, this factor is credited at the GS-13 grade level.

### *Degree of responsibility*

This factor includes the nature and purpose of person-to-person work relationships, and supervision received in terms of intensity of review of work as well as guidance received during the course of the work cycle. This factor includes consideration of the nature and extent of the supervisory control exercised over the work, the nature and extent of the historian's responsibility for personal contact work and for making recommendations or decisions, and similar matters. The degree of "authoritativeness" with which the work of an historian is viewed by his/her agency and by his/her professional fellows and the extent to which his/her opinion is sought and given weight within his/her area of competence also are indicators of the level of his/her responsibility.

At the GS-13 grade level, assignments typically are expressed in terms of the objectives to be served by the study. GS-13 historians are responsible for determining the coverage of the subject and the emphasis to be given to certain subject-matter areas, and for developing and carrying out all phases of the working plan. In the case of studies conducted on a "team" basis, they may be responsible for the direction of team efforts and the integration of supporting studies into a cohesive and meaningful whole. Recommendations made by GS-13 historians regarding the acquisition, preservation, restoration or reconstruction of historic sites are given substantial weight by historians at higher organizational echelons in planning and making recommendations concerning nationwide programs.

Personal work contacts are of the same type as described at preceding levels, but assume particular importance at the GS-13 grade level because of the recognized standing of the historian as a specialist in his/her field. GS-13 historians may be called upon to provide advice and counsel to their professional fellows both within and outside the Federal Government in their particular areas of competence. Contacts with agency management officials assume additional importance since in addition to the purposes described at the GS-12 grade level, GS-13 historians may use these contacts as a means of identifying areas in which historical research should be undertaken in anticipation of future management needs either personally undertaking such projects or recommending and justifying them to their superiors.

In contrast, GS-14 work assignments typically arise out of the continuing requirements of the agency historical program or out of the special needs of agency officials at the highest policy and program planning echelons. Within the broad framework of agency policy, or the expressed needs of agency officials, GS-14 historians are responsible for determining the scope, coverage, and emphasis of their studies, developing and carrying out their working

plans, and producing a completed product which is accepted as authoritative. GS-14 historians concerned with the acquisition, preservation, restoration, reconstruction and interpretation to the public of sites and events of major significance to the national historical heritage are considered as the agency authorities within their areas of specialization. Their recommendations regarding legislative proposals and similar matters relating to national historical parks have a major impact on the nationwide program.

In addition to the personal work contacts described at lower grade levels, GS-14 historians (in recognition of the authoritativeness of their knowledge within their special areas of competence) may be called upon to provide “on the spot” background historical data to agency officials at top management and policy levels in connection with urgent problems, or to attend interagency or international conferences for the same purpose. For example, GS-14 historians could be expected to serve as expert witnesses before committees of Congress during hearings on legislation relating to National Historical Parks.

The appellant points to her functioning in an authoritative capacity as the “single “*lead*” historian on documenting the Service’s history” as indicative of GS-14 grade level responsibility. In this capacity, she cites her “on the spot” historical data research on NPS during World War II, researching records in the National Archives for the Solicitor’s Office for a case going through litigation, and other assignments as example of her continuing program responsibility for the agency’s historical program or out of the special needs of agency officials at the highest policy and program planning echelons, and producing completed products that are accepted as authoritative.

Historians at both the GS-13 and GS-14 grade levels are recognized in their field (recognized standing as a specialist in their field who may be called upon to provide advice and counsel to their professional fellows both within and outside the Federal Government in their particular areas of competence versus considered as agency authorities within their areas of specialization). The difference between the two levels rests primarily on program authority and responsibility, and the representational responsibilities on issues arising from urgent problems. As discussed previously, the program management and work assignment responsibility retained by the appellant’s supervisor precludes the appellant’s position from being credited with GS-14 grade level program management and work control responsibility. The appellant’s “on the spot” historical background work are informational in nature. For example, the call information about NPS operations during World War II from the Public Affairs Office on behalf of the Secretary for an interview on the dedication of the World War II Memorial does not meet the full context of such work at the GS-14 grade level; i.e., in connection with urgent problems, and does not reflect the representational responsibilities found at that level such as serving as an expert witness before committees of Congress during legislative hearings or before national and international conferences on the same types of issues. Therefore, this factor is credited at the GS-13 grade level.

### *Summary*

Since the appellant’s position is evaluated properly at the GS-13 grade level with respect to both classification factors, it must be evaluated at the GS-13 grade level overall.

### *Evaluation using the GS-020 PCS*

The GS-020 PCS uses two classification factors for grade determination: *Nature of the assignment* and *Level of responsibility*.

#### *Nature of the assignment*

This factor measures the scope and difficulty of the work and the skills and knowledge required to complete the assignment.

GS-13 grade level community planners are assigned planning projects that require an extensive knowledge of the laws and regulations administered by their agency, community management, social needs, land requirements, community power structures, precedent cases, and court decisions. In addition to making operating decisions or providing advice and assistance, they must have a thorough understanding of agency policies and priorities, and the provisions and intent of new programs that are in the process of being defined. Characteristically, assignments involve problems lacking in precedents, applicable technical guides, or standards and elements such as those that have a broad impact on planning programs in a metropolitan area, a State, or an agency; or those that involve the development of regulations for new program areas, or of legislative programs.

Illustrative staff assignments include developing regulations, position papers, and instructions related to community planning aspects of agency programs; and reviewing the agency field office programs in community planning for technical and program management effectiveness; including making reports and offering suggestions for improvement based on findings. In performing this work, the community planner must demonstrate marked professional expertise and a depth of knowledge and experience in the planning program requirements, operations, and functional problems of an agency; or in specialized areas of planning, such as urban renewal housing, or transportation. In addition, they must possess, to a high degree, technical judgment, tact, imagination, and resourcefulness.

In contrast, GS-14 grade level community planners provide expert counsel to agency management and professional colleagues on a wide variety of planning questions or problems. These include authoritative interpretation of agency policy, regulations, and standards as applied to problems involving land use proposals or operating problems. In responding to questions, they must weigh the implications for basic agency objectives, legal requirements, and program needs, while being fully aware that the answers they propose may establish precedents with considerable future impact. The work includes important problems involving regions, States, or major municipalities and the community planner must coordinate or negotiate with other Federal agencies, or with top officials of State or local government bodies.

The problems at the GS-14 level involve unusually important, extensive, delicate, and controversial issues. Illustrative staff assignments include developing standards and criteria to guide agency representatives in evaluating comprehensive plans and analytical techniques; providing leadership and advice to top community planners of regions, States, and major municipalities in identifying problems, developing cooperative relationships leading to joint technical efforts in planning projects, in formulating legislation, and in resolving unusually

complex or controversial issues; and preparing and reviewing policy recommendations and technical proposals on assignments of equivalent difficulty and complexity. In addition to the background, abilities, and personal qualities required at the GS-13 level, GS-14 community planners, as experts, must have marked ability to identify parallel areas of program concerns, interests, and goals with State and other governing bodies, and other public and private organizations; the ability to present planning values, techniques, and processes in a meaningful way to professionals in many other fields; and considerable finesse and diplomacy.

The appellant works within program parameters established by her supervisor. Typical of the GS-13 grade level, she works with problems lacking in precedents. Typical of staff assignments that include developing regulations, position papers, and instructions, she performs similar functions in planning and managing the NPS administrative history program. As at the GS-13 grade level, she reviews NPS field office programs in administrative history for technical and program management effectiveness; including making reports and offering suggestions that require her to develop program policies and procedures as discussed previously.

Her assignments fall short of the GS-14 grade level. Although the appellant provides input on policy and program issues for the NPS administrative history program, her supervisor's position is vested with the authoritative interpretative and counseling functions found at this level, e.g., authorizing the development of an oral history instruction and extensive updating of the NPS oral history handbook. Therefore, this factor is credited at the GS-13 grade level.

#### *Level of responsibility*

At the GS-13 grade level, work is assigned in terms indicating objectives, results expected, any major problems anticipated, and priorities. Supervisors participate in decisions involving changes in direction, or departures from established policies, and furnish advice, as requested, on policy or administrative aspects of assignments. Completed work is reviewed primarily for results achieved and conformance to policy. The community planners frequently meet with local and State officials to aid and encourage the adoption of sound planning principles and programs. They have a substantial and continuing responsibility for representing their organizations in negotiations with officials of organizations whose decisions and activities have important implications to the overall planning program.

In contrast, GS-14 grade level work is performed under broad administrative guidance, subject to general policy direction, and the established policies and procedures of the agency. At this level, community planners carry out their work independently but may seek advice on complex policy questions. The work is evaluated in terms of the effectiveness in working with the various publics, soundness of recommendations, and achievement of solutions to significant problems. Major work accomplishments are generally achieved through personal contacts and negotiations with top State, business community, and other groups and officials. In such contacts, community planners speak with authority in explaining agency policy, procedure, and the application of technical requirements. These contacts typically involve negotiation of delicate or controversial issues where the consequences of an inadequate presentation have serious implications for agency programs.

As at the GS-13 grade level, the appellant performs her staff work within the broad objectives and priorities set by her supervisor as discussed previously. Her supervisor participates in decisions involving changes in direction or departures from established policies, and furnishes advice on overall policy direction, e.g., the administrative history program initiative on wildland fire management and expanding local 9/11 initiatives into a broader study conducted by the appellant. Her work is reviewed primarily for results achieved and conformance to policy. As at that level, she has continuing responsibility for representing the NPS headquarters point of view in dealing with activity-level and regional administrative history operations that have important implications to the overall NPS administrative history program.

Unlike the GS-14 grade level, the appellant's supervisor is involved in establishing program and project priorities. The appellant works within program parameters more defined than the general policy direction found at the GS-14 grade level. As discussed previously, the authoritative advisory functions on matters of serious program impact are reserved at levels above the appellant's position in her agency. Therefore, this factor is credited at the GS-13 grade level.

Since the appellant's staff work is evaluated properly at the GS-13 grade level with respect to both classification factors, it must be evaluated at the GS-13 grade level overall.

### **Decision**

The appellant's position is correctly classified as Historian, GS-170-13.