



# UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

Washington, DC 20415

Human Capital Leadership  
and Merit System  
Accountability Division

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

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

**Agency classification:** Outdoor Recreation Planner  
GS-023-9

**Organization:** [installation]  
[name] Field Office  
[name] District Office  
[state] State Office  
Bureau of Land Management  
U.S. Department of the Interior  
[city and state]

**OPM decision:** Outdoor Recreation Planner  
GS-023-9

**OPM decision number:** C-0023-09-01

/s/ Robert D. Hendler

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Robert D. Hendler  
Classification and Pay Claims  
Program Manager  
Center for Merit System Accountability

March 22, 2007

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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*, appendix 4, section G (address provided in appendix 4, section H).

**Decision sent to:**

[appellant's name and address]

[servicing HR office name and address]

Director of Personnel  
U.S. Department of the Interior  
Mail Stop 5221  
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## **Introduction**

The Dallas Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant's name] on December 1, 2006. The appellant's position is currently classified as Outdoor Recreation Planner, GS-023-9, and is located at [installation], [name] Field Office, [name] District Office, [state] State Office, Bureau of Land Management (BLM), U.S. Department of the Interior, in [city and state]. The appellant does not dispute the series of his position, but believes it should be classified at the GS-11 grade level. We received the agency's administrative report on December 26, 2006, and the appellant's comments on that report on January 4, 2007. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

## **General issues**

On September 28, 2005, the appellant requested a desk audit of his position from the [state] State Office's human resources (HR) office. After waiting 10 months with no response, the appellant cancelled his desk audit request and subsequently forwarded his appeal to OPM.

The appellant believes his position is appropriately classified at the GS-11 level, in part, because his current duties and responsibilities were previously performed by the incumbent of a GS-11 position. By law, we must classify positions solely by comparing their duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's position to other positions, which may or may not be classified correctly.

The appellant also believes he is performing work similar to outdoor recreation planners classified at higher grades within the [name] District Office. Like OPM, BLM must classify positions based on comparison to OPM's position classification standards and guidelines. In accordance with 5 CFR 511.612, agencies are required to review their own classification decisions for identical, similar, or related positions to ensure consistency with OPM certificates. Consequently, the appellant's agency has primary responsibility for ensuring its positions are classified consistently with OPM appeal decisions. If the appellant believes his position is classified inconsistently with another, then he may pursue this matter by writing to the HR office at BLM headquarters. He should specify the precise organizational location, series, title, grade, and responsibilities of the positions in question. The agency should explain to him the differences between his position and the others, or classify those positions in accordance with this appeal decision.

## **Position information**

The [name] District Office oversees approximately 2,768,176 acres of BLM lands within the [location], which lies north and west of the [location]. Its attractions include several designated wilderness areas, national monuments, and a Native American reservation. The District employs four GS-023 Outdoor Recreation Planners including a GS-12 Team Leader, a GS-11 assigned to [another installation], and a GS-11 assigned to the [name] Field Office. The fourth, the appellant, is the outdoor recreation planner for the [installation].

The appellant's position is supervised by the Monument Manager, who occupies a GS-340-12 position. The [installation] includes the [name] and [name] special management areas, which lie entirely within the [name] Wilderness and are increasingly popular destinations for visitors worldwide. The appellant is responsible for a number of BLM programs within the [number]-acre monument. These programs include wilderness management, recreation planning and management, sign planning and implementation, transportation planning and implementation, visual resource management, and interpretation planning and implementation.

The appellant and immediate supervisor certified to the accuracy of the duties described in his official position description (PD), number [number]. The appellant's PD and other material of record furnish much more information about his duties and responsibilities and how they are performed. The PD is adequate for classification purposes and we incorporate it by reference into this decision. On February 2, 2007, we conducted a telephone audit with the appellant and a telephone interview with the immediate supervisor to help decide this appeal. In reaching our classification decision, we carefully considered all of the information gained from these interviews, as well as the written information furnished by the appellant and his agency.

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

The agency assigned the appellant's position to the GS-023 Outdoor Recreation Planning Series, titled it Outdoor Recreation Planner, and used the GS-023 standard to determine the grade of his position. The appellant does not disagree and, after careful review of the record, we concur.

### **Grade determination**

The GS-023 standard has two factors: *Nature of the assignment* and *Level of responsibility*.

#### *Nature of the assignment*

GS-9 planners perform difficult and responsible work involving the review, analysis, evaluation, or coordination of matters related to recreation planning, development, and use. They apply resourcefulness and judgment in dealing with problems in selecting, adapting, and applying accepted principles, precedents, and procedures to recreation planning and development. GS-9 is the first level at which the planners work independently to any significant degree on other than very routine assignments. They apply significant understanding of the programs to their assignments.

GS-11 planners perform assignments requiring substantial resourcefulness and the exercise of experienced judgment. They analyze, evaluate, and coordinate matters involving recreation planning, development, and use. GS-11 planners evaluate several alternative approaches to problems and select the best. They regularly adapt standard guides, methods, principles, and procedures in carrying out their duties. GS-11 planners must understand and know the organizational, political, economic, social, and conservational factors involved in recreation planning and use. Therefore, their assignments are broader in scope than those of GS-9 planners,

whose analyses are more basic, require a less developed level of expertise, and less mature judgment. GS-9 assignments are usually segments of the broader studies and require application of existing policies and procedures.

The appellant's position meets the GS-9 level. Similar to this level, the appellant is responsible for the recreational activities at [installation], which includes day-hiking, overnight backpacking, and camping. This involves developing and/or implementing land use, wilderness, and recreation management plans; developing and implementing programs for visitors to promote the effective use of monument resources; and maintaining an interpretive program that involves developing brochures, maps, and signs. The appellant makes various recommendations to the Monument Manager for recreation improvements, which are generally based on information gained through exit surveys of visitor satisfaction; periodic facility inspections; and annual site monitoring findings. The appellant occasionally participates on site monitoring reviews, which are conducted under a cooperative agreement by the [university] Department of Geography, Planning, and Recreation to assess the impact of visitor use on the wilderness character and recreational settings. Comparable to the GS-9 level, this work requires applying resourcefulness and judgment in applying accepted recreation planning principles, precedents, and procedures.

The appellant also reviews special recreation permit (SRP) requests, which allows specified recreational uses at [installation]. He reviews requests to ensure compliance with management objectives and determine potential impact on recreational users and the environment. The appellant summarizes the SRP proposal; completes an environmental assessment, if necessary; routes requests to staff including the National Environmental Policy Act specialist, archaeologist, and wildlife biologist for their input; and forwards his recommendation to the supervisor for approval and signature. This compares favorably with an illustration at the GS-9 level, where the planner reviews permit applications to determine whether the proposed work conflicts with outdoor recreation resources and natural beauty.

The appellant's position meets certain aspects of the GS-11 level criteria, but his assignments do not meet the full scope of work expected at that level. For instance, the appellant has adapted standard guides in carrying out his duties. He participated on a team with the District's outdoor recreation planners to develop the land use plan, which required evaluating the lands' wilderness characteristics. The criteria they developed to evaluate wilderness characteristics were approved by BLM's Washington office. However, the appellant's work is generally not characterized by recurring technical or administrative problems or issues that are diverse and complex, so that the nature of the problems, approaches, and possible solutions require serious analysis.

The appellant provided examples of problems regularly confronted in his work. [Installation's] permit area is divided into the following three geographic units: [name] and its tributaries, [name], and [name]. Permits are issued online up to four months prior to the trip date with the total number of permits issued limited to pre-defined visitor use limits. While an unlimited number of visitors are allowed during the day and 20 visitors overnight at [name], only 20 visitors are allowed during the day at [name] and [name] with no overnight use allowed. This is especially problematic as demand usually far exceeds the permit supply for [name] and its main attraction, [name]. This colorful, weathered rock formation has been photographed in numerous publications and is an increasingly popular destination for international visitors. Consequently,

the appellant is frequently resolving problems caused by the high demand for online permits, which causes disruptions with their server located at the National Information Resources Management Center in [city and state]. The appellant also handles situations requiring the cancellation of permits for non-payment or non-compliance with permit terms. However, the appellant's programs are more standard in nature so that he does not have to substantially adapt established and accepted plans and procedures. Much of [installation] is an isolated plateau in a designated wilderness area. The tightly controlled number of visitors and a limited range of activities limit the appellant's opportunities to substantially adapt established plans and procedures. In contrast, larger and more well-known natural destinations, attracting millions of visitors yearly with multiple museums and a wide range of activities (e.g., hiking, rafting, backpacking, horseback riding, camping, and aerial tours), would normally require substantially adapting, refining, and/or developing plans for high-quality recreation opportunities.

The appellant's duties also do not compare favorably with the illustrative assignments used to clarify the intent of the GS-11 grade level. For example, he is not involved in reviewing and appraising comprehensive outdoor recreation development plans and projects of Federal and State agencies to ascertain their relationship to each other or to the recreation field; conducting studies to investigate and inventory existing and potential recreation resources, analyzing population distribution, judging needs for recreation lands and facilities, and examining relationships of needs to growth and mobility of the population and to the economy; or conducting comprehensive studies of large existing recreational complexes to reassess recreational development needs and to determine the means to achieve optimum recreation use for the life of the project. Therefore, this factor is credited at the GS-9 level.

#### *Level of responsibility*

At the GS-9 level, the supervisor specifies the scope of the assignments, objectives, and desired end product but planners are expected to work independently on routine aspects of their assignments. In controversial matters and problems not covered by guides, precedents, or accepted practices, planners consult higher level planners. Completed work is subject to general technical and administrative review. They make recommendations on project proposals and permit reviews and these recommendations are major considerations in decisions on development or use of resources. They work with Government officials to provide basic technical assistance, obtain planning data, exchange information, and discuss routine aspects of cooperative undertakings.

GS-11 planners carry out their assignments within the framework of basic agency policies, defined objectives, and approved procedures. The supervisors indicate the general scope of assignments. GS-11 planners have considerable freedom in planning their day-to-day work and in choosing appropriate methods and techniques for executing various tasks. Higher level planners advise on special problem areas such as applying new policies and making evaluations where controversial and complex matters are involved. Their recommendations deal with (1) disposal of surplus property for recreation use, (2) development programs for areas which possess recreation potential, (3) areas desirable for acquisition and development for recreational purposes, or (4) disposition of State and agency requests for recreation development funds. Completed work is reviewed for overall adequacy and soundness of results obtained. Nature and

variety of contacts are similar to those at the GS-9 level, but GS-11 planners exercise even greater tact and diplomacy in dealing with professionals in other disciplines, other agencies, and groups. They seek solutions to problems and exchange information through the personal contacts. GS-11 planners seek assistance on unusually complex problems or matters of policy. GS-9 planners do not function so independently; they are also not likely to be placed in charge of complete reconnaissance studies.

In his appeal request, the appellant said, “My PD is consistent with the level of responsibilities for a GS-11 as defined in the Position Classification Standard for Outdoor Recreation Planning Series, GS-0023, available on the OPM website.” We agree that the appellant operates with a greater level of independence than typical of the GS-9 level, where planners are guided by supervisors in specifying assignment scope, objectives, and desired end product. Instead, the appellant independently plans and carries out all work in managing the programs assigned to his position. Typically the only occasion his work requires the supervisor’s review is when agency policies expect the Monument Manager or other higher-level official to review, approve, and sign off on specific actions (e.g., on SRP requests, permit cancellations, or budget requests). Unlike the GS-9 level, the supervisor does not technically review this work and generally accepts the appellant’s recommendations.

The appellant’s position approaches but does not fully meet the GS-11 level. Similar to the 11 level, the appellant has considerable freedom in planning his day-to-day assignments and completing his work, which is reviewed for overall adequacy and soundness of results. The District Office occasionally assigns a project to the supervisor, who may delegate it to the appellant. However, the regular assignments are not of the scope and complexity representative of the GS-11 level and, therefore, do not entail the extent or effect of judgment found at the GS-11 level. The appellant will plan the detailed steps necessary to complete the assignment but will discuss unusual work situations potentially involving controversy with the supervisor. For example, to ease demand on the server from online permit requests, the appellant recommended implementing a lottery system used by BLM and other natural resources agencies. This system of randomly issuing permits is expected to resolve the server crashes caused by the current “first come, first serve” system of issuing permits. Since transitioning to a lottery system requires a fee structure change, the appellant was responsible for drafting a business plan announcing the proposed fee change and inviting the public to comment. The supervisor also tasked the appellant with “selling” the lottery system to the Resource Advisory Committee, which provides advice and recommendations to BLM on resource and land management issues, through a series of presentations and meetings.

The appellant works closely with Government officials from sites bordering [installation] including the [another installation], [another installation], [another installation], [another installation], and the [another installation], comparable to the GS-9 level. The appellant communicates with these officials weekly to discuss terms of specific permits and projects with potentially far-reaching recreation impact. Also typical of GS-9 level contacts, the appellant regularly provides lectures to groups of school students about monument activities. Similar to the GS-11 level, the appellant must use tact and diplomacy in dealing with organized interest groups to resolve their complaints and reconcile conflicting viewpoints. For example, he regularly deals with motorized use clubs, environmentalists, etc., to address their complaints and

educate them on properly using public lands. However, because of the weaknesses discussed previously, the position does not fully meet the GS-11 level, and this factor must be credited at the GS-9 level.

### *Summary*

The nature of the appellant's assignments is evaluated at the GS-9 level while the level of responsibility approaches the GS-11 level. Longstanding OPM classification policy cautions that care must be taken to insure the classification decision is in harmony with the total concept of the grade as depicted in the standard. Determining the intent of the standard requires consideration of the interrelationship of the factors, e.g., nature of assignment and level of responsibility. Neither increased independence nor increased difficulty of assignments is meaningful unless each is viewed concomitantly with the other. The lower of the two grade levels controls the overall grade of this work since the full intent of the higher level is not met. Therefore, the appellant's position is evaluated at the GS-9 grade level.

### **Decision**

The position is properly classified as Outdoor Recreation Planner, GS-023-9.