

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

Dallas Field Services Group
1100 Commerce Street, Room 441
Dallas, TX 75242

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

Appellant: [appellant]

Agency classification: Physical Scientist
GS-1301-12

Organization: [organization}
[name] Regional Coordinating Center
Reclamation and Enforcement
Office of Surface Mining
Department of the Interior
[location]

OPM decision: GS-401-12
title at agency discretion

OPM decision number: C-0401-12-02

/s/ Judith L. Frenzel

Judith L. Frenzel
Classification Appeals Officer

May 16, 2003

Date

As provided in section 511.612 of title 5, Code of Federal Regulations, 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).

Since this decision changes the classification of the appealed position, it is to be effective no later than the beginning of the fourth pay period after the date of this decision, as permitted by 5 CFR 511.702. The appellant's human resources 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's name and address]

Director, Human Resources
Office of Surface Mining Reclamation and Enforcement
U. S. Department of the Interior
1951 Constitution Avenue, NW., Room 334-SIB
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U. S. Department of the Interior
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Introduction

On January 31, 2003, the Dallas Oversight Division, now the Dallas Field Services Group, of the U. S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant]. We received his agency's administrative report on February 21, 2003. The position is assigned to the [organization], [name] Regional Coordinating Center, Reclamation and Enforcement, Office of Surface Mining, Department of the Interior in [location]. The appellant's position is currently classified as Physical Scientist, GS-1301-12. The appellant believes his position should be classified as Environmental Protection Specialist, GS-028-13, or in another appropriate series. We have accepted and decided the appeal under section 5112 of title 5, United States Code.

Background information

Over the past several years, the appellant's position evolved as he absorbed additional duties and responsibilities due to staff losses in his organization. The appellant and his supervisor submitted a revised position description (PD) reflecting the additional responsibilities to the Office of Surface Mining Human Resources Office in July 2002 for classification. The Human Resources Office classified the appellant's work in November 2002, retaining the classification of the position as Physical Scientist, GS-1301-12. The appellant was formally assigned to his official PD, number [number], on January 26, 2003. Following the appellant's reassignment, he appealed the classification of his position to OPM. Both the appellant and his supervisor have attested to the PD's accuracy: the supervisor by signature on the PD cover page dated July 26, 2002, and the appellant in his appeal submission.

We conducted an on-site audit with the appellant on March 14, 2003. We also conducted telephone interviews with the appellant's first- and second-level supervisors. In deciding this appeal, we fully considered the audit and interview findings and all information in the appeal record provided by the appellant and his agency, including his current work assignments and official PD.

General issue

The appellant questions in his appeal how his position could remain at the GS-12 grade level when he has assumed additional duties and responsibilities. Even though the appellant has a large workload consisting of a variety of functions, it is the complexity of those responsibilities and the knowledge required to perform them that influence the grade of a position. Volume of work cannot be considered in determining the grade of a position (chapter 5 of *The Classifier's Handbook*).

Position information

The appellant has responsibility for five functions that support the agency's mission of protecting citizens and the environment during mining and reclamation operations. These functions are briefly described below, with more specific information available in the appellant's position description and appeal submission.

The appellant is responsible for the Applicant Violator System (AVS) for the [name] Regional Coordinating Center (RCC) which covers the States of [nine states]. The AVS tracks the business characteristics and history of individuals and companies that have applied for mining permits.

The appellant manages the processing and approval of applications for new permits and minor or significant revisions, renewals, transfers, and sales or assignment of permit rights for assigned mines. He prepares the fish and wildlife portions of environmental impact statements and environmental assessments using baseline information provided by mining companies. The appellant develops and implements project plans and prepares planning, permitting, and decision documents for approval. Approval requires managing the processing and preparation of National Environmental Policy Act compliance documents, such as environmental analyses and findings of no significant impact.

The appellant assesses civil penalties for notices of violations, cessation orders, and individual civil penalties for [name]RCC field offices. He ensures that notices of proposed penalties are served and determines the eligibility and timeliness of requests of informal assessment conferences. He tracks administrative appeals and notifies inspectors and the Office of the Solicitor of their status. The appellant prepares and transmits assessment case files to the Division of Financial Management for collection.

He serves as the [name]RCC staff specialist for reviewing and approving proposed mining plans for their potential impact on wildlife and habitat needs, with primary emphasis on species protected by Federal, State, or tribal laws. The appellant consults with the Fish and Wildlife Service and coordinates with State and tribal regulatory authorities concerning the potential effect from proposed coal mining activities on threatened and endangered species. The appellant reviews new and revised State regulations for adherence to Federal counterpart regulations.

The appellant provides technical assistance concerning the regulatory requirements for reclamation performance bonding and public liability insurance. He reviews and evaluates a variety of financial bonding instruments to ensure that pledged monies can be collected. The appellant reviews and evaluates various kinds of public liability insurance to ensure that the public is afforded coverage for bodily injury or property damage resulting from mining and reclamation operations.

Series and title determination

The appellant believes the GS-028 Environmental Protection Specialist Series more appropriately addresses his duties and responsibilities because each of the five functions for which he has responsibility relates to environmental protection programs. He states in his appeal submission that he recognizes other occupational series may apply to his position. The appellant's first- and second-level supervisors both state that a professional background in biology, physics, or chemistry is required to perform the appellant's duties. Professional in this context is defined as work that requires education and training in the principles, concepts, and theories of the occupation. The first-level supervisor indicated that a professional knowledge of wildlife biology, aquatic biology, zoology, and/or botany would be his primary focus if he were

filling the appellant's position as it exists today. We agree that a professional knowledge of the biological sciences is considered the paramount knowledge requirement and should be used to determine the series for the appealed position.

Positions requiring professional knowledge and competence are specifically excluded from the GS-028 Environmental Protection Specialist Series. Therefore, we find that this series is not appropriate for the appealed position.

The appellant occupied a number of positions in his agency, including a position classified in the GS-1301 Physical Sciences Series earlier in his career. The agency retained the GS-1301 series when he was reassigned to his present organization in 1996 performing permitting activities. At that time, the position was considered an interdisciplinary professional position. The agency had determined that the nature of the work was such that a person with education and experience in biological sciences (GS-401), physical sciences (GS-1301), or general engineering (GS-801) occupations would be considered equally qualified.

In the case of an interdisciplinary professional position, the final classification of the position is determined by the qualifications of the person who fills it. The appellant possesses a degree in forestry, with an emphasis on natural resource management. Because of the appellant's educational background, the requirement for a professional knowledge of various fields of biology to carry out the appellant's duties as attested to by the first-level supervisor, and the evolution of the appealed position toward environmental issues, we find the position is properly classified in the GS-401 General Biological Science Series. This series is appropriate for positions involving professional work in a combination of several professional fields with none predominant.

OPM has prescribed no titles for positions in this series. Therefore, according to section III.H.2 of the *Introduction to the Position Classification Standards*, the appellant's agency may construct the official title for his position. In doing so, the agency should follow the titling guidance in that section.

Standard determination

Since there are no grade-level criteria directly applicable for positions in the GS-401 series, we examined other classification standards that could be used for comparison. In doing so, we considered the kind of work involved, the knowledge required to do the work, the level of difficulty and responsibility, and the classification factors that would have the greatest influence on the grade level.

Most of the appellant's duties involve the impact of mining operations on the environment that require knowledge of the biological sciences, except for the bonding and public liability insurance duties. The bonding and public liability insurance duties require knowledge of business and financial practices. However, these duties constitute less than 20 percent of the appellant's work. According to the *Introduction to the Position Classification Standards*, duties performed for less than the majority of time are grade controlling only if they are a regular and recurring part of the position, are performed for at least 25 percent of the time, and involve a

higher level of knowledge and skill that would be a factor in recruiting for the position. Although the bonding and insurance duties are regular and recurring, they do not meet the 25 percent threshold and are not paramount in terms of recruiting for the position. We compared those duties against the grading criteria in the GS-1165 Loan Specialist Series (the standard that comes nearest to the kind of work involved and the knowledge required to do the work) and found they do not support a higher grade level than the primary work of the position. Since the bonding and public liability insurance duties have no impact on the grade of the appellant's position, we do not evaluate them further in this decision.

Because the appellant's position involves work related to the potential impact of mining operations on wildlife, we have determined that the most appropriate standard for assessing the appellant's position is the Position Classification Standard (PCS) for the Fishery Biology Series/Wildlife Biology Series, GS-482/486. These series include positions that evaluate the impact of projects and other activities that may adversely affect fishery and wildlife resources and their habitat.

Grade determination

The GS-482/486 PCS is written in the Factor Evaluation System (FES) format. Under the FES, positions are placed in grades on the basis of their duties, responsibilities, and the qualifications required as evaluated in terms of nine factors common to nonsupervisory General Schedule positions.

A point value is assigned to each factor based on a comparison of the position's duties with the factor-level descriptions in the PCS. The factor point values mark the lower end of the ranges for the factor levels. For a factor to warrant a given point value, it must be fully equivalent to the overall intent of the selected factor-level description. If the position fails in any significant aspect to meet a particular factor-level description, the point value for the next lower factor level must be assigned. The total points are converted to a grade by use of the grade conversion table in the PCS. Our evaluation with respect to the nine FES factors follows.

Factor 1, Knowledge required by the position

This factor covers the kind and nature of knowledge and skills needed and how they are used in doing the work.

As described in the PCS, work at Level 1-7 imposes a professional knowledge requirement of fishery or wildlife biology applicable to an intensive subject matter program, such as the management and operation of a fish hatchery, a habitat evaluation program, or a pervasive animal damage control program. This knowledge is used to assess and devise plans to overcome significant resource problems. This includes intensive knowledge and competence in advanced techniques of a highly complex area of fish/wildlife biology sufficient to serve as a troubleshooter, specialist, or coordinator. Level 1-7 is also appropriate for positions that assess and make recommendations concerning the environmental impact of programs such as hydropower and pipeline projects and military activities. The PCS provides an illustration of

work at this level as developing plans to ensure the protection of habitat for a major geographic area, such as a region or multistate district, having a variety of habitat conditions.

Work at Level 1-8 requires a mastery of fishery or wildlife biology to apply new scientific findings, developments, and advances to the solution of critical problems of a particularly novel or highly controversial nature. The work involves resolving problems for which current information is inconclusive or is in the form of suppositions or theories. The nature of the work often involves extending existing techniques to develop new approaches for use by others. Employees at this level are responsible for developing long-range (5 to 15 year) plans for large geographic areas and taking actions that may have significant impact on existing agency policies and programs. Employees at this level are recognized as agency-wide technical experts in a particular resource program or subject matter field that requires applying the latest technological advances to evaluate their potential impact on current and future programs.

Comparable to Level 1-7, the appellant's responsibilities require a professional knowledge of fish and wildlife biology, as well as other related disciplines, to assess the impact of mining and reclamation proposals on aquatic and terrestrial habitats and systems. The knowledge required to review, analyze, coordinate, and monitor proposed and ongoing mining operations, as well as State and tribal regulatory program proposals, involving complex environmental and technical issues is equivalent to Level 1-7. Based on the assessment of damage and the severity of the violation, the appellant determines monetary fines for violations based on noncompliance. He maintains ownership, control, and historic compliance information on companies and individuals to ensure permits are not granted to those with past violations; evaluates plans for potential impact on wildlife and habitat needs with primary emphasis on threatened and endangered species, raptors, game, and other non-game species; and processes and approves applications for new permits or revisions to existing permits for mines in [three states]. The knowledge required to perform these duties is consistent with Level 1-7. The appellant's position description credits him as the [name]RCC expert for civil penalty assessments and the AVS, which is indicative of positions at Level 1-7. The appellant serves as a staff specialist and advisor in his other assigned functions.

Although the appellant is considered an expert in two functions, these functions do not involve new scientific developments or the resolution of critical problems of a particularly novel nature as described at Level 1-8. The appellant's duties affect a major geographic area as depicted at Level 1-7, but his assignments do not have the same impact as being recognized as an agency-wide technical expert as envisioned at Level 1-8 with the resultant impact on agency-wide policies and programs.

Level 1-7 is credited for 1,250 points.

Factor 2, Supervisory controls

This factor covers how the work is assigned, the employee's responsibility for carrying out the work, and how the work is reviewed.

At Level 2-4, the supervisor establishes overall goals and available resources. The employee and the supervisor discuss general objectives, projects, kinds of work to be done, and deadlines. The employee is responsible for planning and executing assignments, selecting appropriate techniques and methodology, and determining the approach to be taken. The employee is expected to resolve most problems that arise and coordinate the work with others. The employee interprets and applies program policy in terms of established objectives and keeps the supervisor informed of progress, potentially controversial problems, and concerns. The supervisor reviews the employee's work for general adequacy in meeting program or project objectives, expected results, and compatibility with other work.

At Level 2-5, supervisory control is exercised through broad, general objectives. The employee operates within the context and constraints of national legislation, agency policy, and overall agency objectives. The employee independently carries out programs, projects, studies, surveys, and investigations. As a technical authority for a bureau or agency, the employee's work is considered as technically authoritative and is normally accepted without significant change. The work is reviewed in relation to broad policy requirements and administrative controls.

The supervisory controls exercised over the appellant match Level 2-4. The appellant reports to the [name] Branch Chief who is ultimately responsible for the quality and timeliness of work products for the Branch. As at Level 2-4, the appellant independently schedules and accomplishes assignments, resolves most conflicts that arise, and coordinates work and resource needs with others. Like employees in positions at Level 2-4, the appellant independently interprets policy and regulations and determines the methods and approaches to take. The appellant keeps his supervisor informed of the progress of assignments, unusual problems, or issues that may be precedent setting in nature. Typical of Level 2-4, the appellant's work is reviewed for adequacy in achieving objectives, adherence to general policies, and accomplishment of agency program requirements.

Level 2-5 is not met since this level reflects administrative supervision only, with full authority delegated to the employee to carry out the work in terms of broadly defined objectives. Although the appellant operates with a great deal of independence and must be familiar with agency policies and directives in his day-to-day work, he operates within the framework of general guidelines and direction in carrying out his responsibilities. The appellant is considered the WRCC expert in certain areas, but this area of functional responsibility is more restrictive than that described in Level 2-5.

Level 2-4 is credited for 450 points.

Factor 3, Guidelines

This factor covers the nature of the guidelines for performing the work and the judgment needed to apply them or to develop new guidelines.

Guidelines at Level 3-4 are often inadequate to deal with the more complex or unusual problems, or with novel, undeveloped, or controversial aspects of fishery/wildlife resource management. The precedents or guides may point toward conflicting decisions, or there may be relatively few

precedents or guides that apply to specific problems. At this level, the employee is required to deviate from or extend traditional methods and practices, or develop essentially new or vastly modified techniques or methods for obtaining effective results.

Employees at Level 3-5 are mostly occupied with major problems that are highly unusual or of national significance. Guidelines are broadly stated and nonspecific, e.g., broad agency policy statements and basic legislation, requiring extensive interpretation. The employee exercises a high degree of judgment, originality, and creativity to interpret and convert general legislative or agency objectives and policies into specific plans, programs, or projects. At this level, the employee adjusts broad agency-wide programs to the latest advances in fishery/wildlife biology. The employee is frequently recognized as an authority in a resource or subject matter area with responsibility for influencing or developing agency policies, plans, or standards that guide other agency personnel.

The appellant's work situation matches Level 3-4. The guidelines available to the appellant include Federal, State, and tribal regulations, statutes, agency regulations and policies pertaining to coal mining and reclamation, administrative and judicial appeal decisions, legal opinions, State cooperative agreements, technical papers, and manuals. These guidelines are very general in nature and do not adequately address some of the more complex problems. The appellant exercises seasoned experience, judgment, and creativity to select and adapt the appropriate guidelines to the problem or issue at hand. Examples include the process for review and approval of proposed mining plans and application for new or revised permits.

Level 3-5 is not met since the appellant is not routinely concerned with problems that are highly unusual or of national significance. The appellant has more than broad agency policies and basic legislation to use as references in performing his work. While the appellant may develop local policy concerning his assigned responsibilities, he is not responsible for developing agency-wide policies or guidance.

Level 3-4 is credited for 450 points.

Factor 4, Complexity

This factor covers the nature of the assignments, the difficulty in identifying what needs to be done, and the difficulty and originality involved in performing the work.

At Level 4-4, employees typically are involved in a full range of professional activities and in the application of many different and unrelated biological concepts. Employees at this level apply flexibility and judgment in approaching problems to obtain an optimum balance between program requirements and policies, differences in the missions of agencies, and the demands of various interest groups. Assignments typically involve administrative and resource problems that require in-depth analysis and evaluation of alternatives, e.g., environmental problems with conflicting requirements accompanied by resolutions with serious implications for the industry, commercial concerns, or the general public. Employees at this level independently identify the boundaries of the problem involved, the kinds of information needed to solve the problem, and the criteria and techniques to be applied in accomplishing the assignments.

Work at Level 4-5 requires many different and unrelated processes and methods for a broad range of activities of substantial depth of analysis. The work involves solving problems concerned with novel, undeveloped, or controversial aspects of fishery/wildlife biology and related disciplines. The problems are complex or difficult due to such characteristics as the abstract nature of the concepts, or the existence of serious conflicts among scientific and administrative requirements or program direction. Employees at this level are required to be especially versatile and innovative in order to recognize possible new approaches, devise new or improved techniques or methods, or to anticipate future trends and requirements in fishery/wildlife resource uses and demands.

The complexity of the appellant's assignments matches Level 4-4. The appellant is responsible for a wide variety of duties in many different and unrelated program activities pertaining to mining operations, e.g., assessment of impact on wildlife and habitat, approval of mining permits, assessment of civil penalties for violations. The assignments involve complex environmental, technical, procedural, and legal issues. Characteristic of Level 4-4, the nature of the appellant's assignments often necessitate extensive and frequent contact with staff resources within the [name]RCC; key officials of Federal, State, and tribal agencies; and the mining industry that may have conflicting interests.

Level 4-5 is not met. The mining and environmental impact issues the appellant deals with are numerous and complex, but they do not involve abstract or undeveloped concepts as those envisioned for crediting Level 4-5. For the more complex environmental issues, the appellant consults with the Fish and Wildlife Service. The appellant is not regularly required to develop new approaches or methods for his assigned functions, nor is he required to handle serious conflicts to the extent described at Level 4-5 such as encountered in coordinating and planning activities that cover a broad multiple-resource program.

Level 4-4 is credited for 225 points.

Factor 5, Scope and effect

This factor covers the purpose of the work and the impact of the work product or service.

The purpose of work at Level 5-4 is to provide advisory, planning, or review services on specific problems, programs, or functions. The work may involve unusual problems, development of new approaches or techniques, and validation of programs and plans such as those associated with studies that are prepared for management or administrative use. Other work involves projects or assignments related to culturing or recovering endangered or threatened species or evaluating the results of research contracts on major fishery/wildlife problems. Work situations may be complicated by administrative problems, the accuracy of databases, and information/exchange methodologies. The work affects the work of state and county officials, tribal organizations, and program managers or technical specialists in outside agencies. The work also influences the effectiveness or acceptability of agency goals, projects, programs, and objectives. Activities typically involve problems that affect the continued existence of a resource or resource area.

At Level 5-5, the primary purpose of the work is to isolate and define unknown conditions, resolve critical problems, and develop new approaches and guides for operating personnel. Employees at this level regularly determine the validity and soundness of theories, standards, and guides for the improvement of resource uses and protection, and they have responsibility for writing or revising a major section of a management plan or directive. Employees at this level draw conclusions from a wide variety of conflicting research efforts and provide expert advice and assistance to scientists and management officials on a wide range of fishery/wildlife matters. The work has considerable influence on the production and management of threatened or endangered species of national and international significance, development of policies and programs, and actions of the agency in a number of program areas in one or more states.

The appellant's work matches Level 5-4. Similar to Level 5-4, the appellant assists the agency in carrying out the intent of the Surface Mining Control and Reclamation Act and National Environmental Policy Act. The appellant's work involves unusual environmental issues, with a focus on protecting endangered and threatened species during and after surface mining operations. Similar to positions at Level 5-4, the appellant's work is complicated by coordinating information and activities between Federal, State, and tribal agencies, mining companies, and private interest groups. The appellant's decisions have a substantial financial, environmental, social, and physical impact on the individuals, companies, and land areas for which he is responsible.

Level 5-5 is not met because the appellant is not regularly dealing with unknown conditions that require him to determine the validity of theories or deal with conflicting research efforts. Although the appellant's work touches on one aspect of Level 5-5 in terms of impact (actions of the agency in a number of program areas in one or more states), his work does not fully meet the overall effect intended for crediting Level 5-5.

Level 5-4 is credited for 225 points.

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

These two factors are evaluated together to recognize their interrelationship. Final point credit is determined by identifying where the evaluations of each factor intersect in the table contained in the PCS.

Persons contacted

Contacts at Level 3 include individuals or groups from outside the employing agency, such as peers and managers from other agencies, contractors, representatives of professional organizations, the news media, foreign representatives at a peer level, or public action groups. This level may also include contacts with the head of the employing agency or program officials several managerial levels removed from the employee. In many cases, the contacts may be on an ad hoc basis, and the role of the party is established and developed during the course of the work.

Contacts at Level 4 are with high-ranking officials from outside the employing agency at national or international levels in highly unstructured settings. Examples include Congressional appropriations committee members, Presidential advisors, State governors, mayors of large cities, presidents of national unions, or the news media on matters of national significance.

Level 3 is met. The appellant has regular contacts with agency staff and management officials; the Office of the Solicitor; professionals and managers of other Federal, State, or tribal agencies; representatives of mining companies; consultants; special interest groups; and landowners. The appellant's contacts are not with the high-level officials depicted at Level 4.

Purpose of contacts

At Level c, contacts are to influence, motivate, interrogate, or control persons or groups who hold different opinions or interests, or may be skeptical, fearful, or uncooperative. The employee uses care in approaching the contacts and gains compliance with established policies and regulations by persuasion or negotiation.

Contacts at Level d are to negotiate, justify, or resolve highly important or controversial matters involving significant or controversial issues. This usually involves active participation in conferences, meetings, hearings, or presentations involving problems or issues of considerable consequence or importance. The persons contacted typically have diverse viewpoints, goals, or objectives, requiring the employee to achieve a common understanding of the problem and a satisfactory solution by convincing them, arriving at a compromise, or developing suitable alternatives.

The purpose of the appellant's contacts match Level c. The appellant's contacts are to develop and exchange information, coordinate activities, provide assistance or clarification on agency regulations and policies, resolve work problems, persuade or influence industry personnel as to the adequacy of their compliance efforts, and negotiate compliance requirements or plans. The appellant's contacts are sometimes with individuals or groups that are skeptical, uncooperative, or hostile. The nature of the appellant's contacts is not of the critical or controversial nature as envisioned at Level d.

Both factors are credited at Level 3c for a combined total of 180 points.

Factor 8, Physical demands

As at Level 8-1, the appellant performs the majority of his work in an office environment that does not impose unusual physical demands. The appellant may occasionally conduct field inspections that require driving, extensive walking, steep climbing, kneeling, stooping, and crawling. The appellant indicates that he may conduct a field inspection once a year. Since the physical demands imposed by field inspections is not a regular and recurring aspect of the appellant's work, assignment of Level 8-2 is not appropriate. At this level, some physical exertion is required to walk over rough or mountainous terrain on a recurring basis.

Level 8-1 is credited for 5 points.

Factor 9, Work environment

The appellant's work environment matches Level 9-1 where work is performed in a normal office environment. Although the appellant's fieldwork may expose him to adverse weather conditions and rough terrain, this work is not regular and recurring. This fieldwork does not meet Level 9-2 where exposure to moderate risks (such as travel in safety-approved air and watercraft, moderate discomforts, and moderate unpleasantness) is regular and recurring.

Level 9-1 is credited for 5 points.

Grade summary

The appellant's position is assigned the following factor levels:

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge required by the position	1-7	1,250
2. Supervisory controls	2-4	450
3. Guidelines	3-4	450
4. Complexity	4-4	225
5. Scope and effect	5-4	225
6. & 7. Personal contacts and Purpose of contacts	3c	180
8. Physical demands	8-1	5
9. Work environment	9-1	5
<i>Total</i>		2,790

Using the Grade Conversion Table in the PCS, a total of 2,790 points falls within the GS-12 range (2,755-3,150 points).

Decision

The appellant's position is properly classified as GS-401-12, with the title at the discretion of the agency.