

U.S. Office of Personnel Management  
Office of Merit Systems Oversight and Effectiveness  
Classification Appeals and ELSA Programs



Washington Oversight Division  
1900 E Street, N.W.  
Washington, D.C. 20415

**Classification Appeal Decision**  
**Under Section 5112 of Title 5, United States Code**

**Appellant:** [name]

**Agency classification:** Public Affairs Specialist  
GS-1035-12

**Organization:** Public Affairs Office  
Office of the Deputy Chief of Staff for  
Information Management  
[Command]  
Department of the Army  
Alexandria, Virginia

**OPM decision:** Public Affairs Specialist  
GS-1035-11

**OPM decision number:** C-1035-11-02

\_\_\_\_\_  
Richard Quasney  
Classification Appeals Officer  
10/19/98

\_\_\_\_\_  
Date

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

Since this decision lowers the grade of the appealed position, it is to be effective no later than the beginning of the sixth pay period after the date of this decision, as permitted by 5 CFR 511.702. The servicing personnel office must submit a compliance report containing the corrected position description and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action.

The personnel office must also determine if the appellant is entitled to grade or pay retention, or both, under 5 U.S.C. 5362 and 5363 and 5 CFR 536. If the appellant is entitled to grade retention, the two-year retention period begins on the date this decision is implemented.

### **Decision sent to:**

[appellant]

[personnel officer, Command level]

Mr. William Duffy  
Chief, Classification Branch  
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## **Introduction**

On June 11, 1998, the Washington Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from [appellant], who is employed as a Public Affairs Specialist, GS-1035-12, in the Public Affairs Office, Deputy Chief of Staff for Information Management, at the [Command], in Alexandria, Virginia. [Appellant] requested that her position be classified as Public Affairs Specialist, GS-1035-13. This appeal was accepted and decided under the provisions of section 5112 of title 5, United States Code.

An on-site position audit was conducted by a Washington Oversight Division representative on September 14, 1998, including an interview with the appellant's first-line supervisor, [name]. This appeal was decided by considering the audit findings and all information of record furnished by the appellant and her agency, including her official position description, number 96101, classified by the servicing personnel office as Public Affairs Specialist, GS-1035-12, on March 19, 1996.

## **Position Information**

The appellant coordinates and carries out all public affairs activities for the Command. This includes providing and/or clearing material concerning the Command's activities upon request by media representatives; coordinating and clearing all requests for visits and interviews with the media; reviewing material prepared for distribution to trade publications and other media outlets for propriety and conformance to Army policy; and preparing news releases, background statements, or other material to convey or clarify the Command's mission and operations as needed. The appellant also facilitates the dissemination of information through maintenance and updating of a public affairs electronic bulletin board, the Command's site on the Internet, and through the compilation and editing of the Command's annual magazine.

## **Series Determination**

The appellant's position is properly assigned to the Public Affairs Series, GS-1035, which covers positions responsible for administering, supervising, or performing work involved in establishing and maintaining mutual communication between Federal agencies and the general public and various other internal and external audiences. Neither the appellant nor the agency disagrees.

## **Title Determination**

The appellant's position is correctly titled as Public Affairs Specialist, which is the authorized title for all nonsupervisory positions in this series. Although the appellant provides technical and some limited administrative supervision to one military employee, this is not a major duty occupying at least 25 percent or more of her time, and as such the position cannot be considered supervisory for titling or evaluation purposes. Neither the appellant nor the agency disagrees.

## **Standard Determination**

The position was evaluated by application of the criteria contained in the position classification standard for the Public Affairs Series, dated July 1981. This standard is written in the Factor Evaluation System (FES) format, under which factor levels and accompanying point values are to be assigned for each of the following nine factors, with the total then being converted to a grade level by use of the grade conversion table provided in the standard. The factor point values mark the lower end of the ranges for the indicated factor levels. For a position 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, unless the deficiency is balanced by an equally important aspect that meets a higher level.

### *Factor 1, Knowledge Required by the Position*

This factor measures the nature and extent of information an employee must understand in order to do the work, and the skills needed to apply that knowledge.

At Level 1-7, work requires knowledge applicable to a wide range of duties involving oral and written communication; skill in modifying standard methods and approaches in developing new information materials; and skill in assessing public reaction, identifying the extent of understanding achieved, and explaining significant issues to generally responsive groups or individuals interested in the agency's programs. Assignment examples provided in the standard to illustrate Level 1-7 knowledge requirements are as follows:

Knowledge and skill sufficient for developing new information materials including news releases, fact sheets, brochures, booklets, broadcast spots, etc., that increase communication with the agency's various publics.

Knowledge and skill sufficient for providing representatives of the print and broadcast media, trade associations, and industrial representatives with timely and accurate explanations of agency policies and regulations.

The knowledge required by the appellant's position matches Level 1-7. The position requires skill in standard written and oral communication techniques to perform such duties as "developing new information materials" (such as news releases, fact sheets, and internal electronic messages) to convey basic information about the Command's programs and to explain significant issues to generally responsive groups (e.g., trade publications geared toward retired or active-duty military personnel.)

The position does not meet Level 1-8. At that level, work requires mastery of communication principles and techniques; skill in developing and applying new approaches to the most difficult and complex public affairs problems by developing or evaluating information programs to enhance understanding among publics opposed to or indifferent to agency programs; skill in analyzing public

reaction to agency programs and policies in developing recommendations that significantly modify an agency's major programs or policies; and skill in integrating diverse points of view in a communication plan to establish and maintain mutual understanding with various agency publics. Illustrative of this level are:

Knowledge and skill sufficient for presenting ideas in written materials in new ways that will increase understanding among publics with varying levels of comprehension of agency programs and policies, or opposition or indifference to the agency's program objectives.

Knowledge and skill sufficient for making on-the-spot presentations to audiences with opposing points of view or erroneous understanding of agency positions to achieve a more balanced perspective among these publics.

Knowledge and skill sufficient for establishing and maintaining effective working relationships with individuals having opposing points of view and conflicting interests and explaining a position while not criticizing other views or arousing damaging hostility.

Knowledge and skill sufficient for analyzing conflicting data and summarizing recommendations or program changes giving consideration to various points of view and specifying the reasons for acceptance or rejection of the input.

There are two basic distinguishing features of this level. The first is the development of new approaches to solve difficult public affairs problems. This does not necessarily refer only to the actual mechanisms used (e.g., electronic bulletin boards, displays, newsletters, etc.), since realistically speaking there may be very little genuinely "new" methodology in the public affairs arena. It may also refer to the manner of presenting the agency position on, for example, issues that have been of continuing controversy or contention with various public interest groups. This presupposes the existence of such sensitive issues, such that the employee would have to examine the reasons for continuing public hostility or mistrust and devise a different approach for explaining the agency's actions or, if necessary, working with agency management to bring about program or policy changes that will satisfy public concerns. There is no evidence of these sorts of conditions in the appellant's work situation. The mission and activities of the Command are not inherently controversial, nor does the Command normally generate any significant negative publicity to itself through these activities. (This is distinguished from the outcome of the tests conducted by the Command, which may be quite controversial, but the appellant is not responsible for explaining and defending test results.) The basic mission of the Command is to conduct operational testing and evaluation of Army systems and equipment. System performance deficiencies or problems identified during this process may attract considerable public and Congressional interest, but this is generally directed toward the system proponents within DoD rather than the testing agency. There are no special interest groups that specifically target the activities of the Command. Therefore, there is limited opportunity for the

appellant to have to examine existing approaches and devise new and more effective ways of presenting information of a controversial nature.

The other distinguishing feature is connected to the first assignment example described above, in that it involves the requirement for presenting information to publics who are either outright hostile and opposed, or at best indifferent to, agency policies and programs. The publics with whom the appellant normally communicates are not hostile or critical of the agency's actions. These audiences consist most prominently of the Command's employees, with whom she communicates through electronic bulletin board where she posts information related to upcoming events, etc., and the various special interest trade publications that are interested in the outcome of the Command's testing activities. The appellant cited only two instances in her two years' tenure in the position where she had to communicate with a "hostile" audience. She contends that the standard does not specify frequency for such contacts and that because these have occurred twice, the associated skills are thus required and applied. However, for a particular duty to be considered in the evaluation of a position, it must constitute a regular and recurring aspect of the position. Two occurrences in the course of two years, on issues that in themselves would not be expected to recur, is not considered "regular," especially within the context of an organization that does not normally generate adverse publicity. In regard to communicating with indifferent rather than hostile publics, there is a presumption at this level that this indifference must be overcome by the public affairs specialist for optimum accomplishment of the agency's mission. Although the Command's activities do not attract any significant interest on the part of the general press, public support or participation is not essential to Command operations and does not affect accomplishment of its mission.

None of the examples cited at Level 1-8 characterize the appellant's position. Specifically, the first example refers to increasing understanding "among publics with varying levels of comprehension of agency programs or policies." Although the appellant argues that this can include a media outlet that is not aware of the Command's mission and requests basic information, the standard clearly contemplates a more difficult situation in this example. The phrase "among publics" indicates that the employee must be communicating with a number of different groups on an issue (thus suggesting that the issue be of sufficient magnitude to have attracted the attention of several groups or constituencies), with varying levels of understanding, requiring the employee to tailor material to fit the informational needs of these various audiences. By contrast, providing basic information to a media outlet, as suggested by the appellant, is clearly covered under Level 1-7.

The second example refers to "making on-the-spot presentations to audiences with opposing points of view or erroneous understanding of agency positions." The appellant again argues that media inquiries and responses to clarify erroneous understanding would meet this requirement. However, the phrase "on-the-spot presentations" connotes a situation where the employee must provide extended, unprepared statements or explanations to live audiences, such as at public hearings, community meetings, or media interviews. There is no requirement for the appellant to perform such duties.

The third example refers to individuals having “opposing points of view and conflicting interests.” The appellant argues that an opposing public could be another Army Command that does not agree with an [Command] report or test result. However, there is no indication that communicating with these other organizations is a significant aspect of the appellant’s position. She cited only one instance where she was involved in facilitating the exchange of information among different Army organizations, in relation to the Force XXI AWE exercise. She does not otherwise have to routinely explain [Command] reports or test results to other Army Commands. In short, simply because hostility between Commands exists, does not mean that it should affect the evaluation of the appellant’s position if it is not actually a factor in her job.

The fourth example discusses analyzing input representing various points of view on program changes and preparing material that explains why the input was accepted or rejected. Regardless of whether this refers to internal or external input, it bears no relation to the appellant’s position.

Level 1-7 is credited.

1250 points

*Factor 2, Supervisory Controls*

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee’s responsibility, and the review of completed work.

At Level 2-4, the supervisor determines the overall objectives and resources available for the work. The employee and supervisor jointly develop deadlines, projects, and nature of the planned assignments. The employee is responsible for planning and carrying out the assignments, resolving most problems, coordinating the work with others, interpreting policy, and determining approach and the methods and techniques to be employed. The employee keeps the supervisor informed of progress, potential controversies, or wide-ranging implications. Completed work is reviewed in terms of achieving expected results, responsiveness, and conformance with agency policy, and may also be subject to clearance procedures from higher levels in the agency.

The level of responsibility under which the appellant works is comparable to Level 2-4. The overall objectives and resources available for the work are established. For nonroutine assignments, the appellant is given direction from the supervisor (either first-line or higher) as to deadlines and general nature of the finished products. The appellant works independently in carrying out and coordinating the work, although she keeps her superiors informed of ongoing events. Most written products (such as press releases) are reviewed generally for such considerations as content and accurate representation of management’s policies or viewpoint. There are rather stringent clearance procedures imposed by the Department of the Army on all requests for information and other contacts with regional or national media sources.

The position does not meet Level 2-5. At that level, the supervisor provides administrative direction by making assignments in terms of the broadly defined mission of the organization’s public affairs program. The employee is responsible for independently planning, designing, and carrying out the

major program functions, informing the supervisor of progress as appropriate. Results achieved are considered technically authoritative and are normally accepted without significant change. Particularly sensitive or controversial issues may be reviewed at headquarters level. Recommendations for new projects and shifts in program objectives are evaluated in terms of resources available, program goals, or agency-wide priorities.

This level presupposes the existence of a certain degree of program management functions and authority, such that the employee would be responsible for planning and overseeing the conduct of the overall public affairs program, including the allocation of manpower and monetary resources. In this case, the appellant is primarily responsible for the conduct of her individual work projects rather than the administration and management of a broader program carried out principally through others. As there are only two other public affairs specialists within the Command, at one field location, there would not even be the opportunity for her to be involved in such functions as determining and allocating resources or providing continual policy guidance on new or recurring public affairs issues. Although she works generally independently in carrying out her work, this in itself does not constitute “administrative” supervision, which implies an almost total absence of technical controls or review over the work, with the supervisor providing only general program oversight to ensure that acceptable relations with the various publics interested in the agency’s mission are maintained. In the appellant’s case, any statements being released to the media on anything other than routine matters are reviewed at higher management levels, either within the Command or at Department of the Army headquarters. Even relatively routine requests for videotaping by the media must be cleared at the headquarters level. The yearly magazine compiled and edited by the appellant is reviewed in draft by her supervisor, who may offer suggestions on treatment or topics. In short, the appellant’s work situation, given the organizational limitations and the controls placed on the work, precludes crediting of this level.

Level 2-4 is credited.

450 points

### *Factor 3, Guidelines*

This factor covers the nature of the guidelines used and the judgment needed to apply them. The standard instructs that the existence of specific procedures and policies may limit the opportunity of the public affairs specialist in making or recommending decisions or actions, and thus may affect the factor level assignment.

At Level 3-3, guidelines include operating instructions, public affairs manuals, agency policies and regulations, and standard agency public affairs practices and precedents. The employee must independently select, interpret, and apply these guidelines, modifying and adapting them to suit specific situations.

The guidelines used by the appellant, and the latitude she has in working within them, match Level 3-3. There are specific procedures in place for obtaining clearance from Department of the Army headquarters, in addition to specific agency guidelines on what information is releasable and the

parameters set for any observation or videotaping of systems testing. Within these guidelines, the appellant uses judgment in advising agency management on permissible activities and responding to routine requests for information.

The position does not meet Level 3-4. At that level, guidelines are agency policy statements or broad precedents that are applicable in establishing general program direction but not totally sufficient for dealing specifically with the more complex or unusual problems encountered on a recurring basis. The employee must deviate from standard procedures in developing new ways to communicate the agency's message on controversial and sensitive issues where public reaction has been negative or indifferent and understanding by agency publics is essential to the success of the agency mission.

The types of "controversial and sensitive issues" expected at this level occur only rarely in the appellant's work situation. Even in those unusual cases where the attention of the national media is drawn, or the Command receives negative publicity, the appellant prepares informational material and forwards it to the Department of the Army for release and for subsequent press contacts. Further, the agency has a limited technical mission that is not dependent on public support or understanding, and its actions are not subject to change or modification based on political or public relations considerations.

Level 3-3 is credited.

275 points

#### *Factor 4, Complexity*

This factor covers the nature, number, variety, and intricacy of the tasks or processes in the work performed, the difficulty in identifying what needs to be done, and the difficulty and originality involved in performing the work.

At Level 4-3, the work includes varied duties requiring the application of standard communication and analytical methods and techniques in conveying information, orally and in writing, using a variety of presentation methods or formats; gathering, analyzing, and presenting information for use by higher level specialists in developing communication plans; or explaining programs and policies to individuals and groups having similar interests in enhancing understanding of agency objectives.

The complexity of the appellant's work is comparable to Level 4-3. The appellant communicates information to various publics, both internal and external, using a variety of techniques and mechanisms. These publics generally have similar interests in obtaining basic information or Command activities and operations. The appellant has no involvement in developing a comprehensive communication plan, as her work tends to be reactive rather than anticipatory.

The position does not meet Level 4-4. At that level, the work requires the application of advanced communication and analytical practices and techniques to the solution of complex public affairs problems, such as developing and presenting informational material to achieve understanding of various points of view or concepts from publics with varying levels of understanding and different

interests and perspectives on the subjects; employing a number of information gathering techniques in collecting and analyzing public reaction to information programs; and developing information for management in improving the agency's communication with the general public and specialized groups.

The appellant's work situation does not present complex public affairs problems, such as issues or information that must be communicated to a number of different publics with differing interests or opinions on the subjects. She does not perform such pro-active functions as collecting and analyzing public reaction to the information disseminated (e.g., through public opinion surveys.) She does not develop information for management on improving communication with the general public (such communication is minimal) and specialized groups. For example, although she reviews draft articles being submitted to specialized trade publications, there is no indication that she is involved beforehand in determining what aspects of Command operations or specific activities should be publicized to which particular media outlets.

Level 4-3 is credited.

150 points

*Factor 5, Scope and Effect*

This factor covers the relationship between the nature of the work, and the effect of the work products or services both within and outside the organization.

At Level 5-4, the purpose of the work is the development of complete communication plans for an organization and provision to program officials of advisory, planning, and technical services in designing approaches to resolve public affairs problems. The work contributes to the achievement of program objectives by clarifying the issues and alternatives facing agency managers in achieving meaningful communication between the agency and the various publics.

The scope and effect of the appellant's work match Level 5-4. The purpose of her work is to coordinate all public affairs activities for the Command. Her work has an overall affect on the effectiveness of the Command's relations with its various publics.

The position does not meet Level 5-5. At that level, the purpose of the work is the identification of the reasons for public misunderstanding or indifference to agency programs and policies and the development of alternative communication strategies that enable the agency to establish and maintain mutual understanding with the various publics. The work affects the successful achievement of major programs conducted by the agency and the social and economic well-being of substantial numbers of people included in the groups affected by the continued efficient operation of these programs.

The mission of the Command is to conduct operational testing and evaluation of Army systems and equipment. There is nothing inherently controversial or discretionary about the Command's activities such that they would foster misunderstanding as to the basis for particular decisions or actions, nor does this mission affect "substantial numbers of people" constituting the organization's publics. Thus,

the work situation does not engender the type of environment where the appellant would have to develop strategies to continually communicate with its publics on activities being undertaken by the Command, to explain the basis for its actions and decisions to various interest groups, and to elicit public support or cooperation necessary for the “successful achievement of major programs.”

Level 5-4 is credited.

225 points

*Factor 6, Personal Contacts*

This factor includes face-to-face and telephone contacts with persons not in the supervisory chain. The relationship between Factors 6 and 7 presumes that the same contacts will be evaluated under both factors.

At Level 6-3, contacts are with representatives of the news media or with professional and/or trade organizations where the contacts are not routinely established; or with management officials within the agency where the employee is serving in a consulting capacity on sensitive or controversial issues, and there is difficulty in encouraging the managers to adopt recommendations.

The appellant’s personal contacts match Level 6-3, in that she has contacts with media representatives and with staff of various special interest trade publications.

The position does not meet Level 6-4. At that level, contacts are with nationally known members of the news media, national leaders of civic or trade organizations, State governors, mayors of large cities, or high-level county or regional government officials. The appellant has no contacts of this nature.

Level 6-3 is credited.

60 points

*Factor 7, Purpose of Contacts*

This factor covers the purpose of personal contacts ranging from factual exchange of information to situations involving significant or controversial issues and differing viewpoints and objectives.

At Level 7-2, the purpose of the contacts is to coordinate activities, provide advice, or present analyses of factual information used in developing strategies for communicating agency policies and programs.

The purpose of the appellant’s contacts is consistent with Level 7-2. The appellant coordinates clearance requests to Department of the Army headquarters, and coordinates the submission of magazine articles; advises management on procedures for allowing media observation or videotaping of system testing; and prepares factual summaries of Command activities for external release.

The position does not meet Level 7-3. At that level, the purpose of the contacts is to analyze, develop, and present alternative approaches in developing communication strategies for misunderstood agency policies or programs, or to present clarifications of agency activities or policies to specialized groups, the general public, or the news media.

This level presupposes that there are continuing or recurrent controversies or misunderstandings on the part of the various publics related to the agency's activities that the public affairs specialist would be charged with resolving. The appellant's work situation does not provide much occasion for these types of more demanding interpersonal relations.

Level 7-2 is credited. 50 points

*Factor 8, Physical Demands*

This factor covers the requirements and physical demands placed on the employee by the work situation.

The position matches Level 8-1, which covers sedentary work.

Level 8-1 is credited, 5 points

*Factor 9, Work Environment*

This factor considers the risks and discomforts in the employee's physical surroundings or the nature of the work assigned and the safety regulations required.

The position matches Level 9-1, which describes a typical office environment.

Level 9-1 is credited. 5 points

*Summary*

<u>Factors</u>	<u>Level</u>	<u>Points</u>
Knowledge Required	1-7	1250
Supervisory Controls	2-4	450
Guidelines	3-3	275
Complexity	4-3	150
Scope and Effect	5-4	225
Personal Contacts	6-3	60
Purpose of Contacts	7-2	50
Physical Demands	8-1	5
Work Environment	9-1	<u>5</u>
Total		2470

The total of 2470 points falls within the GS-11 range (2355-2750) on the grade conversion table provided in the standard.

**Decision**

The appealed position is properly classified as Public Affairs Specialist, GS-1035-11.