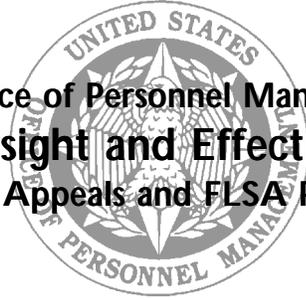


U.S. Office of Personnel Management  
Office of Merit Systems Oversight and Effectiveness  
Classification Appeals and FLSA Programs



Washington Oversight Division  
1900 E Street, N.W.  
Washington, DC 20415

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

**Appellant:** [name]

**Agency classification:** Support Services Supervisor  
GS-342-12

**Organization:** Fire Services Division  
[field installation]  
Bureau of Land Management  
Department of the Interior  
[city and State]

**OPM decision:** Support Services Supervisor  
GS-342-12

**OPM decision number:** C-0342-12-02

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Linda Kazinetz  
Classification Appeals Officer

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February 17, 2000  
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).

**Decision sent to:**

[appellant]

Ms. Carolyn Cohen  
Director of Personnel  
Department of the Interior  
Washington, D.C. 20240

[servicing personnel officer]

## **Introduction**

On July 12, 1999, the San Francisco Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from [appellant], who is employed as a Support Services Supervisor, GS-342-12, in the Fire Services Division, [field installation], Bureau of Land Management (BLM), Department of the Interior, in [city and State]. (The appeal was subsequently reassigned to the Washington Oversight Division.) [Appellant] requested that his position be classified as GS-342-13 or GS-301-13. This appeal was accepted and decided under the provisions of section 5112 of title 5, United States Code.

The appellant had previously appealed the classification of his position to the Bureau of Land Management, but that appeal was denied and the current classification sustained on February 19, 1999.

Telephone interviews were conducted by a Washington Oversight Division representative with the appellant on January 18, 2000, and with the appellant's first-line supervisor, [name], on February 10, 2000. This appeal was decided by considering the audit findings and all information of record furnished by the appellant and his agency, including his official position description, number A04325, most recently certified by the servicing personnel office as Support Services Supervisor, GS-342-12, on May 18, 1998.

## **Position Information**

The appellant serves as Chief of the Fire Services Division, which is responsible for the provision of operational, administrative, and hazardous materials support services for the [field installation], and for the provision of maintenance and ground transportation support and some administrative and hazardous materials support to the [district office]. This includes such functions as housing and food service operations; transportation services including vehicle maintenance and fuel facilities; equipment maintenance and facilities construction and maintenance; provision of supplies and equipment for all fire suppression operations; warehouse operations; management and conduct of the [field installation] training program including fire training; general office services and administrative support including printing, mail management, files and records management; travel processing; procurement services; and fiscal support services including payments for emergency equipment and personnel, rental and contract aircraft usage, and other expenses.

## **Series Determination**

The appellant's position is properly assigned to the Support Services Administration Series, GS-342, which covers positions the primary duties of which involve supervising, directing, or planning and coordinating a variety of services functions that are principally work-supporting. Such service functions include (but are not limited to) communications, procurement of administrative supplies and equipment, printing, reproduction, property management, space management, records management, mail service, facilities and equipment maintenance, and transportation. This basically characterizes the appellant's position, as the functional responsibilities of his division are typical of those covered under this series.

The appellant proposed that his position be alternately classified to the GS-301 Miscellaneous Administration and Program Series. However, that series is reserved for administrative positions involved in the performance of specialized work not otherwise covered by another established occupational series. Since the appellant's position closely matches the description for the GS-342 series, there is no basis for assigning his position to the GS-301 series.

### **Title Determination**

The appellant's position is correctly titled as Support Services Supervisor, which is the authorized title for supervisory positions in this series.

### **Grade Determination**

The appellant's position was evaluated using both the GS-342 series standard and the General Schedule Supervisory Guide.

#### ***Evaluation Using Support Services Administration Series, GS-342***

The standard for the Support Services Administration Series, GS-342 (dated November 1978), is written in a narrative format with grade level criteria expressed in terms of three factors, Nature of Services, Organizational Environment (which is further subdivided into three elements), and Level of Responsibility. Positions are evaluated in terms of the criteria presented in the various level and element definitions within each of the three factors. Point values for the levels and elements assigned are then totaled and corresponding grade levels are derived through use of a conversion chart provided in the standard. Level or element criteria must be substantially met before a level or element may be credited, and only those point values that appear in the standard may be used.

#### ***Factor 1 - Nature of Services***

This factor measures the nature and scope of the support services provided to the organization and the extent of the program planning and advisory services required of the support services chief. This factor is expressed in terms of five levels.

The position meets Level D, where the chief is responsible for planning and directing the work of employees engaged in several major, interrelated support services program areas. Examples provided in the standard include such functions as planning and administering a supply management program when this involves the use of central supply channels, direct purchase, and formal procurement, and where special needs (e.g., automation of operations, procurement of specialized or high dollar value equipment) necessitate extensive factfinding and analysis; analyzing the organization's needs for such services as printing and duplicating when this involves determining the type of equipment best suited to the needs, integrating these functions with other operations such as graphic and photographic arts, publications, and distribution, and deciding on the optimum location and arrangement of printing plants; planning and administering a mail system for an organization where very large volumes of mail

are involved and where various automated systems are thus required; planning and designing graphic exhibits or printed material used in an organization's public information program; analyzing the organization's requirements for space and facilities based on anticipated volume of operations, future plans for expansion or contraction of operations, and negotiating with service agencies and lessors to adapt or lease space; or work of equivalent difficulty and responsibility.

The [field installation] is a relatively small field office with about 80 permanent full-time employees, increasing to a total workforce of approximately 400 during the fire season with the addition of a large seasonal staff. Thus, it does not require most of the more complex, internally-oriented support services functions described at this level, such as large-scale printing, photographic, and graphics services, an automated mail processing system, or a continuing space management program. However, it does support a relatively large external firefighting contingent, particularly in the areas of supply, training, financial support, and housing and food services. Specifically, review of the position descriptions for several of the appellant's subordinates indicates that he directs such activities as:

- Coordinating [field installation] fire cache operations with the General Services Administration and other national fire caches; developing cooperative agreements, reimbursable accounts, and operating guidelines for [field installation]; coordinating and participating in the reallocation of supplies and equipment among 13 national caches; and maintaining adequate stocking levels of all fire suppression supplies.
- Developing the Statewide [field installation] fire training program, incorporating organizational, job, and manpower analyses in the determination of training needs; coordinating training plan implementation Statewide, including with the [State] and other Federal agencies; and incorporating all [field installation] employees in the training plan to meet individual employee career development needs.
- Providing technical expertise in the management of potentially hazardous materials and contaminated lands resulting from various fire activities and unauthorized disposal; administering contracts for hazardous materials cleanup operations; and preparing contingency plans for emergency procedures.

These functions are considered comparable in difficulty and responsibility, and in the degree of planning and analysis required, to those presented in the standard as examples of Level D work.

Level E is not met, where the chief is responsible for planning, directing, and coordinating support services programs and functions that require a very high degree of technical and analytical ability, usually on an agencywide basis (or for major sub-organizations that operate autonomously.) The appellant's position is located at the field office level and thus does not have coverage agencywide (i.e., Departmentwide) or for a major autonomous sub-organization such as a bureau. Further, given that the appellant's subordinates are mostly Wage Grade employees and General Schedule employees

in one-grade interval occupations, they would not be performing work requiring the very high degree of analytical ability expected at this level.

Level D is credited.

32 points

*Factor 2 - Organizational Environment*

This factor measures the impact of the organization on the support services job, and is expressed in terms of the following three elements.

*Element 1, Nature of Demands Placed on the Support Services Programs*

This element is measured in terms of the complexities involved in providing services to support the functions of the organization, and the stability of the organization.

The position meets Level A, where the organizations serviced consist of a small to moderate number of functional subdivisions (i.e., 4-7) performing similar functions related to a common mission, such as at a field office, training facility, or repair and maintenance facility. The organization and its functions tend to remain stable for long periods of time. This description characterizes the [field installation], which is basically a field office comprising three divisions (fire services, fire operations, and information systems) and associated staff offices, with the common mission of providing fire suppression and related support services on designated [State] lands. The [field installation] is stable, has not reorganized in the past few years or been subjected to any significant functional changes.

Level C is not met, where the organizations serviced consist of a much larger number of subdivisions and frequently involve satellites or different organizational levels, such as would be found in a multi-State, regional organization containing several district offices, or a major military installation or command. Organizational and functional changes tend to occur frequently (i.e., as often as every two years), and require substantial changes in both the nature and scope of the services provided. The [field installation] is a field office with no subordinate organizational levels or sizable, year-round satellite offices (excluding from consideration two small field offices open only in the summer and manned by a few employees.) The appellant's provision of certain support services to firefighting teams is not comparable to supporting a regional organization or a major military installation, each of which would have more employees and a greater multiplicity of functions that would in turn demand more complex and varied support services.

Level A is credited.

4 points

*Element 2, Scope of the Support Services Program*

This element relates directly to the size of the organization serviced, as measured in terms of the portion of the workforce receiving all or the preponderance of the support services. This refers to

those employees who are directly served by the support services organization, i.e., who require the services in order to accomplish the principle work of the organization.

The appellant's program provides external support services to firefighters deployed within [field installation] jurisdiction. These are the employees who receive the preponderance of the support services provided by the appellant's organization. The support services organization may support up to 2500 firefighters at the peak of the fire season. This falls within the Level D range (1551-3050).

Level D is credited.

8 points

### *Element 3, Program Coordinating Responsibilities*

This element is credited for those positions responsible for coordinating support services programs at subordinate or satellite organizations, in the form of developing and issuing policy guidance and conducting periodic reviews. This does not apply to the appellant's position.

### *Factor 3 - Level of Responsibility*

This factor measures level of responsibility in terms of the nature and type of supervision under which the chief works; the extent to which the work is controlled by guidelines and instructions; the extent of the chief's authority to recommend changes to, or alter the work of, the support services organization; the nature and purpose of the chief's personal contacts; and the chief's personnel management responsibilities.

The position meets Level C, where chiefs operate with substantial freedom in planning, organizing, and directing the support services program, within the parameters of basic agency policy guidelines and operating instructions. At this level, there are significant contacts with managers in the organizations to which services are provided, for such purposes as negotiating changes and securing cooperation for installing those changes. The chief frequently makes binding commitments for the support services program. Also at this level, chiefs establish operating guidelines for subordinate supervisors in the performance of their personnel management responsibilities, take action to resolve significant personnel management problems, and approve, modify, or reject specific personnel action requests. This accurately portrays the responsibilities inherent in the appellant's position.

Level D is not met, where chiefs are responsible for planning, establishing, and coordinating support services programs within the broad administrative framework of an agency, and participate in the development of support services program policy throughout an agency or major subordinate organizations. They make recommendations regarding overall budget and manpower resources utilization and are responsible for program development and execution. At this level, personnel management responsibilities, although highly significant, are less important than the primary responsibilities for planning, managing, and directing overall support services programs. This level,

in its description of agencywide policy and budgetary responsibilities, applies to positions at a higher organizational level than that of the appellant.

Level C is credited.

32 points

*Summary*

<u>Factors</u>	<u>Level</u>	<u>Points</u>
Nature of Services	D	32
Organizational Environment		
Element 1	A	4
Element 2	D	8
Element 3 - no credit		
Level of Responsibility	C	<u>32</u>
Total		76

The total of 76 points falls within the GS-11 range (72-76 points) on the grade conversion table provided in the standard. Since this grade is lower than that derived through application of the General Schedule Supervisory Guide, the GSSG will serve as the controlling standard.

***Evaluation Using the General Schedule Supervisory Guide***

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

The appellant disagrees with the agency's factor level assignments for factors 1, 3, 4, 5, and 6.

*Factor 1, Program Scope and Effect*

The element *Scope* addresses the complexity and breadth of the program directed and the services delivered. The geographic and organizational coverage of the program within the agency structure is included under this element.

Under *Scope*, the position meets Level 1-2 in terms of the complexity of the work directed (i.e., administrative, technical, complex clerical, or comparable work.) The nonsupervisory subordinate staff is comprised mostly of Wage Grade employees and General Schedule employees in one-grade interval occupations that are most closely comparable to "complex clerical" work. Level 1-3 is not met, as that requires direction of technical, administrative, protective, investigative, or professional work (i.e., two-grade interval occupations.)

Likewise, Level 1-2 is met under this element in terms of organizational coverage of the program (i.e., a typical agency field office, an area office, or a small to medium military installation), in that the [field installation] is best characterized as a field office. Level 1-3 is not met in terms of its organizational coverage, comparable to a large or complex multimission military installation, as this is defined as an installation with several major, separate activities and a total serviced or supported population exceeding 4000 personnel. The [field installation] does not approach this description in either multiplicity of mission or number of employees. Level 1-3 is partially met only in regard to geographic coverage (i.e., a major metropolitan area or State), if the northern half of [State] is considered comparable to a State, but otherwise the preponderance of the position meets Level 1-2 under this element.

The element *Effect* addresses the external impact of the program.

Under *Effect*, the position matches Level 1-2, where services affect area office level or field office operations, rather than Level 1-3, where services directly and significantly impact a wide range of agency activities or the work of other agencies. At the field activity level, Level 1-3 under this element relates to large, complex, multimission organizations and/or very large serviced populations, and directly involves the provision of essential support operations to numerous, varied, and complex technical, professional, and administrative functions. The appellant's program operates within the context of a small, single-mission field activity rather than a large, complex, multimission organization. It supports fire suppression activities within [State] on a variety of Federally- and State-administered lands, but this is not comparable to directly and significantly impacting a wide range of BLM activities or the work of other agencies. Illustrations of Level 1-3 assignments provided in the Guide are as follows:

Directs design, oversight, and related services for the construction of complex facilities for one or more agencies at multiple sites. The facilities are essential to the field operations of one or more agencies throughout several States.

Directs administrative services (personnel, supply management, budget, facilities management, or similar) which support and directly affect the operations of a bureau or a major military command headquarters; a large or complex multimission military installation; an organization of similar magnitude; or a group of organizations which, as a whole, are comparable.

The external impact of the appellant's program is not comparable to the first illustration above, as the support services functions provided are not essential to the overall field operations of several agencies throughout several States. Likewise, in regard to the second illustration and the provision of support services internal to the organization, the [field installation] is a field office and is not comparable in scope to an entire bureau or a large or complex multimission military installation as that term is defined in the GSSG.

Level 1-2 is credited.

350 points

*Factor 2, Organizational Setting*

The appellant's immediate supervisor reports to an SES position, consistent with Level 2-2.

Level 2-2 is credited.

250 points

*Factor 3, Supervisory and Managerial Authority Exercised*

This factor covers the delegated supervisory and managerial authorities exercised on a recurring basis.

The appellant's delegated supervisory authorities and responsibilities fully meet Level 3-3b in its description of various second-level supervisory functions. Level 3-4 is clearly not met for the following reasons:

Level 3-4a involves the exercise of delegated authority to oversee the planning, direction, and execution of a program or several program segments. This is program management work that includes such functions as approving multiyear and longer work plans, overseeing the revision of long-range goals and objectives, managing the development of policy changes, managing organizational changes or major changes to the structure and content of the programs directed, and exercising discretionary authority to approve the allocation and distribution of funds. The appellant contends that his position should be credited with this level because he is responsible for managing several program segments and for instituting policy and organizational changes. However, this level applies to managerial positions responsible for broad programs or functions at higher organizational levels than the appellant's position. The appellant works at the lowest organizational level of the agency. He is not a program manager responsible for determining overall fire suppression goals, objectives, policy, and funds distribution for the agency. The primary responsibilities of his position are supervisory (i.e., directing subordinate staff and ensuring the effective accomplishment of daily operations), not managerial, in nature.

Level 3-4b involves exercising final authority for the full range of personnel actions and organization design proposals recommended by subordinate supervisors. Although the appellant and his supervisor indicated that in practice the appellant's personnel proposals are rarely challenged or reversed, most personnel action requests are discussed with the supervisor beforehand and are submitted to the servicing personnel office through the supervisor. This is not equivalent to the "final authority" required at this level, which would be applicable to the head of an organization or a very high-level management official who takes personnel actions virtually unilaterally.

Level 3-3 is credited.

775 points

#### *Factor 4, Personal Contacts*

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

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

To be credited under this subfactor, the level of contacts must contribute to the successful performance of the work, be a recurring requirement, and require direct contact.

The appellant's contacts meet Level 4A-2, where contacts are with higher ranking managers and staff throughout the field activity or at higher organizational levels, representatives of local public interest groups, State government employees, local reporters, and case workers in Congressional district offices. The appellant does not routinely have the types of unplanned and independent contacts expected at Level 4A-3, i.e., high ranking managers at agency headquarters, key staff of public interest groups, Congressional committee staff assistants, or local officers of public action groups. These contacts would normally take place in meetings and conferences and would often require extensive preparation of briefing materials. The appellant provided no examples of contacts of this nature. His contacts with Post Commanders are more indicative of the local contacts covered under Level 4A-2 than the national-level contacts typical of Level 4A-3. Although he contends that he has contacts with high-ranking managers within the Department, there is no continuing requirement in his position to personally meet with and brief high-level headquarters staff.

Level 4A-2 is credited.

50 points

##### *Subfactor 4B, Purpose of Contacts*

This subfactor covers the purpose of the personal contacts credited under subfactor 4A.

The purpose of the appellant's contacts are consistent with Level 4B-2 (i.e., planning and coordinating work, resolving differences of opinion), rather than Level 4B-3, where the primary purpose of the contacts is managerial in nature, such as representing the organizational unit in negotiations, in obtaining or committing resources, and in gaining compliance with policies, regulations, or contracts. At Level 4B-3, the contacts usually involve active participation in conferences, meetings, and hearings involving problems or issues of considerable consequence or importance to the program. The appellant contends that he has the authority to commit resources. However, these resources consist of fire suppression supplies and equipment, and they are allocated based on priorities established by a collaborative effort of [field installation] management. This is not equivalent to the types of authority expected at this level, i.e., independently meeting with other agency management to settle issues of considerable importance to the program. The appellant does not have the authority to unilaterally commit major program resources to other agencies.

Level 4B-2 is credited.

75 points

*Factor 5, Difficulty of Typical Work Directed*

This factor measures the difficulty and complexity of the basic work most typical of the organization directed, that constitutes 25 percent or more of the workload of the organization.

The appellant supervises a staff of approximately 30 permanent full-time employees, increasing to over 100 at the peak of the fire season with the addition of a large seasonal staff. The majority of the nonsupervisory staff is comprised of Wage Grade employees in grades WG-2 to WG-10, and General Schedule employees in mostly one-grade interval occupations in grades GS-4 to GS-7, with a few General Schedule employees in two-grade interval occupations. Based on position and workload data provided by the servicing personnel office, the highest level of nonsupervisory work performed is GS-7.

The appellant supervises eight nonsupervisory General Schedule employees above GS-7 (one GS-12, seven GS-9's), and eleven nonsupervisory Wage Grade employees at WG-9 and above. Since not all of these employees are full-time, even if the Wage Grade employees were considered to be performing at least some portion of work equivalent to GS-9, these higher-graded Wage Grade and General Schedule employees would not constitute at least 25 percent of the overall staff. The next highest level of General Schedule work supervised with an appreciable number of positions is GS-7 (five positions, with one GS-8 position.) The vast majority of the remaining Wage Grade positions are considerably lower-graded and would not approach GS-9 equivalency. For these reasons, GS-7 is the highest level that represents at least 25 percent or more of the overall staff.

Level 5-4 is credited.

505 points

*Factor 6, Other Conditions*

This factor measures the extent to which various conditions contribute to the difficulty and complexity of carrying out supervisory duties, authorities, and responsibilities. If the level selected under this factor is either 6-1, 6-2, or 6-3, and if three or more of the eight Special Situations described are met, the original level selected is increased by one level.

The appellant's position meets Level 6-3b, which involves directing subordinate supervisors over positions in grades GS-7 or GS-8. Level 6-4 is not met as it requires either substantial coordination of work at the GS-11 level, or directing subordinate supervisors who each direct substantial workloads comparable to the GS-9 or GS-10 level.

## *Special Situations*

### *1. Variety of Work*

This element is credited. The appellant supervises work in several different and distinct functional areas. Since his subordinate supervisors are classified to these disparate occupations, he must directly exercise both technical and administrative responsibility over the work, and this directly affects the difficulty of his supervisory duties. All of the occupational fields represented are at least at the GS-7 base level of work.

### *2. Shift Operations*

This element is credited, since the organization operates on two shifts during the fire season.

### *3. Fluctuating Work Force or Constantly Changing Deadlines*

This element is not credited. The appellant's workforce includes a significant seasonal staff. However, the burden of supervising these additional employees falls on the first-line supervisors rather than on the appellant.

### *4. Physical Dispersion*

This element is not credited. The appellant has only a few employees working at remote sites, rather than a substantial portion of the workforce as required for crediting. Further, since these few employees are supervised by subordinate supervisors rather than the appellant, this does not increase the difficulty of his day-to-day supervisory duties.

### *5. Special Staffing Situations*

This element does not apply.

### *6. Impact of Specialized Programs*

This element may be credited when the supervisor is responsible for a significant workload in grades above the base level of work credited in Factor 5, provided the grades of this work are not based upon independence of action, freedom of supervision, or personal impact on the job.

The appellant is responsible for the work performed by one GS-028-12, two GS-1102-9's, and four GS-462-9's (two of them seasonal), all of whom are above the GS-7 base level credited under factor 5. (The grades of the GS-482-11 and GS-301-11 are based on supervisory duties rather than substantive work performed and thus are not considered under this element.) However, within the context of the total workforce, these seven positions are not considered to represent a "significant

workload” considering that they fall far short of the 25 percent threshold required for base level crediting.

*7. Changing Technology*

This element does not apply.

*8. Special Hazard and Safety Conditions*

This element is not credited. Since most of the Wage Grade work performed is recurring (i.e., maintenance and warehouse work), the safety hazards are known and established procedures are in place for dealing with them. Although the appellant contends that the encounter of hazardous materials is unpredictable, given that this work is performed by only one employee, this would not be a regularly occurring situation as is required for crediting of this element.

Since only two of the above special situations apply to the appellant’s position, an additional factor level increase is not warranted.

Level 6-3 is credited.

975 points

*Summary*

<u>Factors</u>	<u>Level</u>	<u>Points</u>
Program Scope and Effect	1-2	350
Organizational Setting	2-2	250
Supervisory/Managerial Authority	3-3	775
Personal Contacts		
Nature of Contacts	4A-2	50
Purpose of Contacts	4B-2	75
Difficulty of Work Directed	5-4	505
Other Conditions	6-3	<u>975</u>
Total		2980

The total of 2980 points falls within the GS-12 range (2755-3150) on the grade conversion chart provided in the GSSG.

**Decision**

The appealed position is properly classified as Support Services Supervisor, GS-342-12.