

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

San Francisco Field Services Group
120 Howard Street, Room 760
San Francisco, CA 94105-0001

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

Appellant: [The appellant]

Agency classification: Resource Management Specialist
GS-301-12

Organization: [Appellant's organization/location]
U.S. Department of the Air Force

OPM decision: GS-301-12
(titling at discretion of agency)

OPM decision number: C-0301-12-07

Carlos A. Torrico
Classification Appeals Officer

March 21, 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).

Decision sent to:

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Introduction

On October 4, 2002, the San Francisco Oversight Division, now the San Francisco Field Services Group, of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [the appellant]. On November 15, 2002, the Division received the agency's administrative report concerning the appeal. His position is currently classified as Resource Management Specialist, GS-301-12. However, the appellant believes his position should be classified as Chief, Information Technology Operations, GS-2210-12. The appellant works in the [appellant's unit/location], U.S. Department of the Air Force. We have accepted and decided his appeal under section 5112 of title 5, United States Code (U.S.C.).

This appeal decision is based on a careful review of all information furnished by the appellant and his agency. In addition, to gather more information about the position, an OPM representative conducted separate telephone and on-site interviews with the appellant and his current supervisor and also interviewed the former supervisor, the [organization] budget director, and contractor representatives. Both the appellant and his supervisor have certified to the accuracy of the appellant's official position description (PD) [number].

General issues

The appellant compares his position to other positions and makes various statements about his agency's evaluation of his position. In adjudicating this appeal, our only concern is to make our own independent decision on the proper classification of his position. By law, we must classify positions solely by comparing their current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's position to others as a basis for deciding his appeal. We have considered his statements only insofar as they are relevant to making that comparison.

Position information

The appellant's position is located in the [organization], which develops and launches military and civilian satellite systems. The [organization] consists of several [units]. Each is responsible for one or more satellite systems. The appellant's [unit] is responsible for developing and operating the launch systems they need. The appellant's [unit] receives information systems support from the [organization]. The [organization] establishes and maintains information and data exchange systems to integrate program office operations with those of geographically separated missile launch sites within constraints agreed upon with the [military unit], which establishes and maintains the [installation's] information systems infrastructure. The appellant's position is the head of this [organization] and reports to the [organization] Deputy Director. The appellant supervises no employees, but he oversees an information technology (IT) contractor workforce. His position serves as the focal point on all matters related to information system operations at the [organization]. These activities impact program operations at all levels within the [organization] including launch contractor operations in [names of three geographic locations].

The appellant has three principal duties relating to [organization] information systems that occupy 85 percent of his time: (1) providing management support services, including overseeing a \$3 million information management system budget, (2) monitoring the security of information systems and activities, implementing computer security plans, and conducting risk assessments and security training, and (3) overseeing IT equipment maintenance contracts.

Management support services are focused on ensuring adequate information system capability for current and future needs of the [organization]. To accomplish this, the appellant assesses the [organization's] IT needs; projects budget requirements on an annual and multiyear basis for various potential IT systems configurations and service levels; develops recommendations for the funding, purchase, installation, integration, and maintenance of IT hardware and software; prepares and executes the annual [organization] IT budget; and monitors and assesses improvements to IT systems and operations. The appellant additionally projects workloads, recommends changes in IT contractor workforce levels, and conducts cost-benefit analysis to inform recommendations.

Information security related duties require the appellant to assume primary responsibility for information security for the [organization]. The appellant evaluates overall computer security in the [organization] and prepares its IT accreditation packages; refines security policies and practices to ensure accreditation; ensures that information systems are operated, maintained, and disposed of according to such security policies and practices; and oversees the [organization's] online computer security awareness training and education.

The appellant serves as contracting officer's technical representative for two IT services contracts. These contracts collectively and directly provide the [organization] its technical, network, and database management information system support services. The appellant ensures contract compliance by providing administrative direction, monitoring costs, and evaluating performance.

The appellant spends 10 percent of his time serving as [organization] Equipment Custodian and 5 percent of his time as [organization] representative to the [organization] [Board] working group. As Equipment Custodian, the appellant ensures the accountability of information system hardware by maintaining inventories and exercising fiscal responsibility and control over hardware assigned to the [organization]. As [organization] representative to the [Board], the appellant attends monthly meetings to discuss current and future issues affecting [organization] information systems infrastructure and the various systems it supports.

The results of our interviews, the appellant's PD, and other material of record, provide more information about the appellant's duties and responsibilities and how they are performed.

Series, title, and standard determination

The appellant disagrees with his agency's assignment of his position to the Miscellaneous Administration and Program Series, GS-301. He believes the work he performs meets the criteria in the Information Technology Management Series, GS-2210, as described in the GS-2200 Job Family Standard (JFS) for Administrative Work in the Information Technology Group.

The GS-2200 JFS specifies that work previously classified in other series be included in the GS-2210 series only when knowledge of IT principles, concepts, and methods is paramount. The appellant believes his work meets this test. However, the appellant's primary duties do not require the depth of knowledge of information technology contemplated by the GS-2210 series. The GS-2210 series covers positions that manage, supervise, lead, administer, develop, deliver, and support IT systems and services. The appellant's position does not perform the full scope of such duties and responsibilities. He is responsible for IT systems support for the [organization] but fulfills that responsibility largely through oversight of contracts through which IT support is actually delivered. Although given the authority to make technical as well as resource decisions, and considered a technical authority by management, the appellant generally does not make technical decisions without regular contractor consultation and does not directly supervise the technical IT aspects of the contractor work.

The breadth and depth of the appellant's IT decisions are substantially limited. The [organization's] IT infrastructure, consisting of a local area network and various connected computer peripherals, was initially established by the [military unit], which is responsible for base-level IT services. Although the appellant's unit is delegated responsibility for managing this infrastructure, it cannot change it significantly. The appellant's unit must adhere to a large body of IT systems development, implementation, and maintenance policy and guidance that is developed at higher levels within the agency. His duties involving computer security are concerned with ensuring that IT systems are operated and maintained according to security policies and practices, including conducting risk assessments and taking measures so that systems are accredited and certified as secure. The appellant conducts these assessments within the context of Air Force level directives that address security vulnerabilities. Assessments involve supplying the Air Force with answers to a series of questions applicable to the systems environment, physical environment, etc. To conduct them, he does not need in-depth knowledge of IT methods and techniques or security assessment software, but he must understand the activities of the [organization] as they relate to security. While assessments require that he must have some knowledge of anti-virus software and the networking of IT systems, they do not require in-depth knowledge of IT principles and concepts and do not involve any of the functions commonly performed by specialists in information security outlined in the GS-2210 series discussion.

The appellant spends 90 percent of his time performing a variety of administrative, maintenance oversight, and security related duties in support of [organization] information systems. While aspects of his work are similar to positions classified in the Management and Program Analysis Series, GS-343, he does not perform the full scope of GS-343 duties. Unlike that series, he does not advise management on the evaluation of the effectiveness of government programs and operations, or on the productivity and efficiency of the management of Federal agency programs. As previously mentioned, the appellant also monitors the security of automated information systems and implements computer security plans. However, those duties consume no more than 20 percent of his time and do not meet the scope of positions classified in the Security Administration Series, GS-080. While he is concerned with the handling, protection, and security of automated sensitive information, he does not identify the need for protection and security; develop and maintain the physical means used for it; and develop, maintain and

implement procedural and technical methods and guidelines for ensuring security typical of positions in the GS-080 series.

The appellant's position is best placed in the Miscellaneous Administration and Program Series, GS-301. Similar to that series, his primary work is of an administrative, two-grade interval nature, and recruitment sources are from individuals having administrative backgrounds. The paramount knowledge and qualifications required are analytical ability and substantial knowledge of program principles and concepts sufficient to assess the [organization's] automated data and security functions and requirements, general knowledge of the methods and techniques for budget development and oversight, and knowledge of the methods to evaluate program support services. The other duties that he performs, e.g., equipment custodian, are ancillary to this work and occupy too small a portion of the appellant's time to affect the classification of his position. Like GS-301 positions, the appellant's position involves specialized work for which no other appropriate occupational series has been established.

The standard for the GS-301 series prescribes no official title. Therefore, assignment of a title is at the agency's discretion. However, in constructing the title the agency must follow the titling instructions in section III.H.2 of the *Introduction to the Position Classification Standards*.

There are no published grade level criteria for positions classified in the GS-301 series. Positions classified in that series are evaluated by reference to an appropriate multiseries guide or a standard for a specific occupational series that involves analogous knowledge and skills. To evaluate the appellant's administrative and security duties related to [organization] information systems, we applied the grading criteria in the Administrative Analysis Grade-Evaluation Guide and conducted a cross-series comparison to the GS-080 position classification standard (PCS) to assure proper assessment of the subject-matter demands of the position.

Grade determination

The appellant does not question the grade level of his position. We have compared his duties to the nine factors discussed in the Administrative Analysis Grade-Evaluation Guide and GS-080 PCS, and concur with the agency that GS-12 is the appropriate grade for the appellant's position.

Decision

The proper series and grade of the appellant's position is GS-301-12. Selection of an appropriate title is at the discretion of the agency.