

**CLASSIFICATION APPEAL DECISION OF THE
U.S. OFFICE OF PERSONNEL MANAGEMENT
CHICAGO FIELD SERVICE OFFICE**

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

POSITION NUMBER: HCFL9A

AGENCY CLASSIFICATION: Supervisory Asylum Officer
GM-930-13

POSITION LOCATION: U.S. Department of Justice
Immigration and Naturalization Service
Office of the Director International Affairs
Asylum Division
[location] Asylum Office
[location]

OFFICE OF PERSONNEL MANAGEMENT DECISION: **Supervisory Asylum Officer
GS-930-13**

OPM DECISION NUMBER: C-0930-13-03

This appellate decision constitutes a certificate that is mandatory and binding on administrative, certifying, payroll, and accounting offices of the Government. It is the final administrative decision on the classification of the position, not subject to further appeal. It is subject to discretionary review only under the conditions and time limits specified in Part 511, Subpart F, of Title 5, U.S. Code of Federal Regulations.

/s/

FREDERICK J. BOLAND
CLASSIFICATION APPEALS OFFICER
12/2/96

DATE

DECISION TRANSMITTED TO:

[name]
Director, [location] Office of Asylum
Immigration and Naturalization Service
[location address]

[name]
Regional Personnel Officer
Immigration and Naturalization Service
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Chester Arthur Building, Room 2006
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Director, Personnel Staff
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INFORMATION CONSIDERED

- ▶ Appellant's classification appeal received September 5, 1995, giving the reasons for his appeal and subsequent submissions in response to our requests for additional information.
- ▶ Copy of the appellant's official position description, number HCFL9A.
- ▶ Copy of appellant's immediate supervisor's position description.
- ▶ Copy of appellant's subordinates' position descriptions.
- ▶ Copy of the organization charts for the appellant's organization.
- ▶ Agency letter of April 26, 1996, responding to our request for additional information on population served by the [location] Asylum Office.
- ▶ Phone audit with the appellant July 9, 1996, and follow-up telephone calls.
- ▶ Phone audit with the appellant's supervisor July 19, 1996.
- ▶ Memo delineating selection authorities dated October 15, 1996.

EVALUATION CRITERIA

- ▶ OPM occupational definition for *Hearings and Appeals*, GS-930, series.
- ▶ OPM *General Schedule Supervisory Guide*, dated April 1993.

INTRODUCTION

The appellant contests his agency's decision classifying his position, number HCFL9A, as Supervisory Asylum Officer, GM-930-13. The position is located in the Department of Justice, Immigration and Naturalization Service (INS), Office of the Director International Affairs, Asylum Division, [location] Asylum Office, [location]. The appellant believes his official position description accurately portrays his duties, but feels his work warrants higher credit based upon its scope and effect, supervisory and managerial authority, purpose of contacts, and other conditions that add to the difficulty of supervision (Factors 1, 3, 4, and 6 of the *General Schedule Supervisory Guide*).

The appellant also cites the classification of higher graded positions similar to his own to support his appeal, indicating that five of the eight Asylum Office Directors were upgraded to GS-14. He specifically cites the GS-14 [location] Asylum Office Director position, to which he was temporarily promoted in 1993, as having the same duties and approximately the same workload as his own. By law, positions are classified based upon their duties, responsibilities, and qualification requirements compared to the criteria specified in the appropriate OPM classification standard or guide. Other methods of evaluation, including comparison to other positions, are not permitted. Agencies are, however, required to apply classification standards and OPM decisions consistently to ensure equal pay for equal work. Accordingly, our letter transmitting this decision to the agency advises that it respond to this issue.

JOB INFORMATION

As the [location] Asylum Office Director, the appellant directs a staff of about 26 employees. A GS-13 Supervisory Asylum Officer heads each of two units in his office, both of which have five GS-11/12 Asylum Officers and three GS-4/5 Asylum Clerks. One of the units also has a GS-7 Contact Representative. The appellant directly supervises a GS-9 Administrative Assistant, a GS-7 Congressional Liaison Assistant; a GS-7 Computer Assistant, and a GS-5 Secretary. Newly added positions include a GS-13 Quality Assurance/Training Supervisor, another GS-11/12 Asylum Officer, and a GS-6/7/8 Supervisory Asylum Clerk.

The [location] Asylum Office adjudicates asylum applications and withholding of deportation applications of refugees living in [names of 15 states]. The asylum officers review applications for asylum, schedule and conduct interviews, assess information, and make determinations based on relevant statutes, regulations, operating instructions, and case law. The appellant spends nearly all his time directing the office's work and managing the asylum program. Little of his time (less than 25 percent) is spent personally performing Asylum Officer work.

ANALYSIS AND FINDINGS

Series and Title Determination

The Hearing and Appeals, GS-930, series includes positions, like the appellant's, that adjudicate or oversee the adjudication of cases requiring formal or informal hearings that accord due process, that arise under statute or under the regulations of a Federal agency when the hearings are not subject to the Administrative Procedure Act. Such work requires the ability to review and evaluate investigative reports and case records, conduct hearings in an orderly and impartial manner, determine credibility of witnesses, sift and evaluate evidence, analyze complex issues, apply agency rules and regulations and court decisions, prepare clear and concise statements of fact, and exercise sound judgment in arriving at decisions. The appellant exercises supervisory authorities and responsibilities meeting the criteria for coverage under the *General Schedule Supervisory Guide* (GSSG); i.e., his duties require accomplishment of work through combined technical and administrative direction of others, constitute a major duty requiring at least 25 percent of the position's time, and meet at least the minimum level of Factor 3 in the guide.

The GS-930 series definition does not prescribe an official title. Agencies may designate the official title of positions in such cases. The *Supervisory Asylum Officer* title used by the agency is consistent with OPM instructions on constructing official titles, as explained in the *Introduction to the Position Classification Standards*, Section III, H, 2.

Grade Determination

The appellant's program management and supervisory duties and responsibilities are evaluated under the GSSG. (The GS-930 series has no supervisory or other grading criteria of its own.) Work demanding less than a substantial amount of time (at least 25 percent) is not considered. Consequently, any hearings work personally performed by the appellant is not examined.

The GSSG uses a point-factor evaluation approach where the points assigned under each factor must be fully equivalent to the factor-level described in the guide. If a factor is not equivalent in all respects to the overall intent of a particular level described in the guide, a lower level point value must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level.

Factor 1: Program Scope and Effect

This factor measures the general complexity, breadth, and impact of the program areas and work directed, including organizational and geographic coverage. It also assesses the effect of the work both within and outside the immediate organization.

Scope addresses complexity and breadth of the program or work directed, including the geographic and organizational coverage within the agency structure. Effect addresses impact of programs, products, or correctly performed work both within and outside the agency.

All work for which the supervisor is both technically and administratively responsible, including work accomplished through subordinates or contractors, is considered. To receive credit for a given level, the separate criteria specified for both scope and effect must be met.

Subfactor 1a: Scope

Level 1-3 involves the direction of a program segment performing administrative, investigative, or professional work where the program segment and work directed encompass a major metropolitan area, a state, or a small region of several states.

Level 1-4 involves the direction of a segment of a professional, highly technical or complex administrative program that involves the development of major aspects of key agency administrative, regulatory, or policy development or comparable, highly technical programs.

The appellant agrees with the INS evaluation of program scope at Level 1-3, based upon the administrative nature of the work and the several states encompassed. Unlike Level 1-4 scope, the work does not involve the development of major aspects of key agency programs or policy. We evaluate Scope at Level 1-3.

Subfactor 1b: Effect

At Level 1-2, services directed significantly affect field office operations and objectives. In a field office providing services to the general public, furnishing a portion of such services, often on a case basis, to a small population of clients meets this level. The size of the population serviced by the field office is the equivalent of all citizens or businesses in a major portion of a small city. Depending on the nature of the service provided, however, the serviced population may be concentrated in one city or spread over a wider geographic area.

At Level 1-3, services *directly and significantly* affect a wide range of agency activities, other agencies, outside interests (e.g., a segment of a regulated industry), or the general public. Furnishing a significant portion of the agency's line program to a moderate-sized population of clients meets this

level. The size of the population serviced by the position is the equivalent of a group of citizens and/or businesses in several rural counties, a small city, or a portion of a larger metropolitan area. Depending on total population serviced by the agency and the complexity and intensity of the service itself, however, the serviced population may be concentrated in one specific geographic area, or involve a significant portion of a multistate population, or be composed of a comparable group.

The appellant claims Level 1-3 effect based upon the population his office serves and the impact of its work on other offices, agencies, and the general public. For example, he suggests that the sizable alien population without permanent residence within his jurisdiction is potentially affected by his office's decisions, that INS District Offices overlapping his jurisdiction [names of 7 offices] are affected by his office's work, and that his Asylum Officers work closely with other agencies on stowaway and smuggling cases as well as especially sensitive diplomatic defections. He also indicates that his office must work closely with the Executive Office for Immigration Review, the immigration court system for persons his office has interviewed and referred for denial and possible deportation.

The [location] Asylum Office potentially could service all classes of non-immigrants admitted to the United States. The appellant views this potential as the alien population in his jurisdiction without permanent residence. However, those in refugee and asylee status that receive significant service from the Chicago office are far less in number than the overall potential. According to the *Statistical Abstract of the United States*, 1994, the INS's *Statistical Yearbook* showed refugees and asylees totaled less than 120,000 for the United States in 1992. Asylum offices in [names of six offices] each serve a portion of this population equal to or, in some cases, larger than the appellant's office. Even if adjusted for possible inflation, when portioned across eight offices, the refugee and asylee population is readily comparable to the range credited in other appeal decisions granting Level 1-2 credit, e.g., a Supervisory Social Insurance Administrator servicing about 20,000 applicants and claimants annually and a Supervisory Inspector whose staff screens nearly a million alien visitors annually, but significantly affects only about 45,000 of them. Consequently, the portion of the population serviced by the [location] office falls short of Level 1-3's moderate population criterion.

In further support of his appeal, the appellant claims his office impacts the general public by preserving a long tradition of humanitarianism. Such social benefits are largely intangible and the effect of properly processing asylum applications on the general public is indirect. The direct impact of the asylum office's work is on those who have fled persecution in other countries. Their personal and economic well being, rather than the general public's, is directly and significantly affected by the office's decisions. Since Factor 1 assesses only the *direct and significant* effect of properly performed work, the size of the general population within the appellant's jurisdiction has virtually no bearing upon his Factor 1 credit.

The appellant claims the work he directs has major impact on all other INS offices. He points out that asylum cases referred to INS immigration judges comprise 80 percent of the judges' dockets, that trial attorneys are assigned to prosecute these cases from various INS District offices, that his office is a full partner with INS District offices on Asylum Fraud Task Forces, that stowaways are processed

with the cooperation of the INS Inspections Branch, and that his office is responsible for over 50 percent of the docket of all deportation branches in the INS District offices within his jurisdiction.

While the [location] Asylum Office's work undeniably affects cases taken to court and impacts other areas of INS, Level 1-3 effect concerns direct and significant impact on a wide range of Justice Department activities, rather than other INS functions. Consequently, the office's work fails to meet Level 1-3 based upon widespread agency affect.

The appellant further claims that because the [location] field office of the Federal Bureau of Investigation (FBI) has developed several very important cases involving national security through information imparted by his office and because information received from asylum applicants will sometimes be of use to U.S. Consuls abroad, his office has direct and significant impact on other agencies.

The Asylum Office's mission is to adjudicate applications rather than gather intelligence. Sharing beneficial information with other organizations or agencies developed while adjudicating asylum applications is not comparable to directing a workforce that gathers intelligence for digestion by other agencies. Work equivalent to that cited in the guide would include the impact of directing programs that, as part of their mission, provide construction, housing, maintenance, health, protection, or comparable services to other agencies. Consequently, the appellant's program fails to meet Level 1-3 based upon other agency affect.

We credit Effect at Level 1-2.

To receive credit for Level 1-3, the work directed must fully meet Level 1-3 in both scope and effect. The appellant's work meets the scope requirements, but not the effect. Therefore, we evaluate this factor at Level 1-2 and credit 350 points.

Factor 2: Organizational Setting

This factor considers the organizational position of the supervisor in relation to higher levels of management (the rank of the person to whom the supervisor reports for direction and appraisal).

Under this factor, if the position being classified reports directly to a Senior Executive, flag officer, or the equivalent, it receives Level 2-3 credit. If not, but the second level supervisor of the position being classified is a Senior Executive, flag officer, or the equivalent, it receives Level 2-2 credit. In all other cases, the position being classified receives minimum credit, Level 2-1. Full deputies are treated as being at the same level as the deputy's chief for this factor. A position reporting to more than one individual is considered to report to the individual who appraises his performance.

The appellant's performance is rated by a GS-14 Supervisory Asylum Officer and reviewed by a Senior Executive. Therefore, we evaluate this factor at Level 2-2 and credit 250 points.

Factor 3: Supervisory and Managerial Authority

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

Level 3-2 provides three alternative sets of criteria. The third of these options (cited in paragraph 3-2c of the guide) specifies ten authorities and responsibilities characteristic of supervisors functioning at this Level. The appellant exercises nearly all these authorities and thereby meets Level 3-2.

Level 3-3 specifies two alternative sets of criteria. The first of these, Level 3-3a, essentially concerns managerial positions closely involved with high level program officials in the development of overall goals and objectives. Managers at this level typically direct the development of data to track program goals, secure legal opinions, prepare position papers or legislative proposals, and execute comparable activities. Though the appellant has input to some of these activities, he lacks significant responsibility in these areas. Such responsibilities belong to higher level positions than his own.

He claims, however, to have sufficient authority to fully satisfy Level 3-3b criteria, which describe 15 supervisory authorities that exceed in complexity and responsibility the ten depicted under paragraph 3-2c. Under this alternate provision, a position can be credited at Level 3-3b if, *in addition* to exercising all or nearly all the Level 3-2c authorities, it also exercises at least 8 of the 15 supervisory authorities specified at Level 3-3b.

Factor 3-3b credits the greater difficulty of supervision stemming from the need for subordinate supervisors to help ensure plans are carried out, policies understood, objectives accomplished, discipline maintained, etc. This need stems from the organization's complexity rather than from the number of designated supervisors or team leaders. The [location] Asylum Office lacks highly complex operations, an unusual rate of change, extraordinary difficulties in training subordinates or assessing their work accomplishments, and similar attributes that might demand a narrow span of control. Its workload and organizational complexity only marginally approach the minimum level where multiple supervisors might be needed to oversee substantive, mission related work. This weakness, coupled with the shortcomings explained below, preclude crediting the appellant's position with Level 3-3b.

There are at least eight Level 3-3b authorities (numbers 3, 4, 8, 9, 10, 11, 12, and 14) that the appellant does not regularly exercise to a significant degree.

Under authority 3, a supervisor ensures equity of both performance standards *and* rating techniques developed by subordinates. The appellant indicates that a considerable portion of his time is spent in developing and amending performance work plans. Authority 3, however, requires that his subordinate supervisors exercise the formal authority to develop standards. The resulting variation in standards would significantly add to the complexity and difficulty of his responsibility for equitable performance specifications. Though he develops standards himself, the lack of significant exercise of such authority by his subordinate supervisors precludes credit for authority 3.

Authority 4 requires direction of a program or major program segment with significant resources (for instance, one at a multimillion dollar level of annual resources). The appellant only exercises control over the budget for his own organization, which does not involve a multimillion dollar level of annual resources. Therefore, this authority is not credited.

Authority 8 requires recommending selections for subordinate supervisory positions *and* similar positions. The appellant states that he has selected subordinate supervisors as well as leaders for circuit ride teams, project leaders for the office move, etc. However, the authority to select first level Supervisory Asylum Officers is retained by the Executive Associate Commissioner, two levels above the appellant. The appellant does not directly recommend selection of these supervisors to the selecting official. Instead, his recommendation goes through his supervisor, who may modify it, who makes the direct recommendation to the selecting official, and who is already credited with this authority. Consequently, authority 8 is not credited.

Under authority 9, a supervisor hears and resolves group grievances or serious employee complaints. The appellant states that he deals frequently with individual employee concerns informally, before they become serious complaints, and indicates that he recently dealt with a grievance from an employee about ratings. This authority, however, refers to resolving serious (e.g., sexual harrassment), rather than common, complaints or group grievances of similar magnitude. No significant exercise can be found to support the appellant's claim to this authority.

Under authority 10, a supervisor reviews and approves serious disciplinary actions (for instance, suspensions) involving nonsupervisory subordinates. The appellant's supervisor indicates the appellant may propose suspensions but cannot approve them, consequently, this authority cannot be credited.

Authority 11 requires making decisions on nonroutine, costly, or controversial training needs and training requests. The appellant claims such authority but supports it by reference instead to routine training such as word processing training for the entire office. He stresses that he arranges in-house country condition training that addresses controversial topics, as when Palestinian support groups and the Hebrew Immigrant Aid Society speakers presented opposing views. Though controversy surrounds the topics discussed, there is nothing controversial about such training for his staff, which must be familiar with issues they may confront when adjudicating cases. Therefore, authority 11 is not credited.

Authority 12 involves determining whether contractor-performed work meets standards of adequacy needed to authorize payment. The appellant points out that his office has contractors handling network and personal computer problems, maintenance of two office vehicles, and office equipment service and maintenance. The contracted work, however, is supportive in nature and does not require technical assessment comparable to substantive, mission related work, e.g., determining the adequacy of information developed by a contractor conducting an investigation of an asylee's claims. Therefore, this authority is not credited.

Under authority 14, a supervisor recommends awards or bonuses for nonsupervisory personnel *and* changes in position classification. Asylum offices are allocated virtually uniform positions with little deviation among the offices in series or grade. Given these circumstances, recommendations to change the classification of positions would have little reasonable chance for adoption. The changes in classification of support staff cited by the appellant in support of his claim resulted from implementation of the Office Automation standard, rather than his reorganization of work. Therefore, this authority is not credited.

Given the above limitations on the position, the appellant cannot be credited with significantly and regularly exercising a majority of the authorities listed under Level 3-3b. Therefore, we evaluate this factor at Level 3-2c and credit 450 points.

Factor 4: Nature and Purpose of Contacts

This is a two-part factor that measures the nature and purpose of personal contacts related to supervisory and managerial responsibilities. The contacts used to determine credit level under one subfactor must be the same used to determine credit under the other subfactor.

Subfactor 4A: Nature of Contacts

This subfactor covers the organizational relationships, authority or influence level, setting, and preparation difficulty involved in the supervisor's work. To be credited, contacts must be direct and recurring, contribute to the successful performance of the work, and have a demonstrable impact on the difficulty and responsibility of the position.

At Level 4A-3, frequent contacts are with high ranking managers, supervisors, and technical staff at bureau and major organization levels of the agency; with agency headquarters administrative support staff; or with comparable personnel in other Federal agencies; key staff of public interest groups with significant political influence or media coverage; journalists representing influential city or country newspapers or comparable radio or television coverage; congressional committee and subcommittee staff assistants below staff director or chief counsel levels; contracting officials and high level technical staff of large industrial firms; or local officers of regional or national trade associations, public action groups, or professional organizations; and/or State and local government managers doing business with the agency. Contacts include those that take place in meetings and conferences and unplanned contacts for which the employee is designated as a contact point by higher management. They often require extensive preparation of briefing materials or up-to-date technical familiarity with complex subject matter.

At Level 4A-4, frequent contacts are with influential individuals or organized groups from outside the employing agency, such as executive level contracting and other officials of major defense contractors or national officers of employee organizations; regional or national officers or comparable representatives of trade associations, public action groups, or professional organizations of national stature; key staff of congressional committees, and principal assistants to senators and representatives, for example, majority and minority staff directors, chief counsels, and directors of field operations; elected or appointed representatives of State and local governments; journalists of major

metropolitan, regional, or national newspapers, magazines, television, or radio media; SES, flag or general officer, or Executive Level heads of bureaus and higher level organizations in other Federal agencies. Contacts may take place in meetings, conferences, briefings, speeches, presentations, or oversight hearings and may require extemporaneous response to unexpected or hostile questioning. Preparation typically includes briefing packages or similar presentation materials, requires extensive analytical input by the employee and subordinates, and/or involves the assistance of a support staff.

The appellant claims Level 4A-4 credit indicating he has regular personal contact with Senators, Congressmen, presidents of legal societies, law schools, heads of voluntary agencies, heads of other agency field offices, journalists, television and radio reporters and members of the general public. He indicates that his contacts take place in meetings, conferences, speeches and television appearances and his preparation typically includes developing briefing packages. His supervisor further indicates that the INS Commissioner expects all Asylum Office Directors to spend at least 50 percent of their time in liaison with the press and government and non-government agencies.

Level 4A-4 is the highest level of personal contact recognized. Contacts with Senators, Representatives, heads of bureaus and higher level organizations in other Federal agencies, and journalists from major metropolitan media are recognized at Level 4A-4. However, they must occur on a frequent basis and require extensive analytical input in developing the necessary briefing packages. Such demands are often imposed upon staff at the highest levels of an organization who develop agency policy, but typically occur less frequently and require less extensive analysis outside these levels. The appellant's highest level contacts lack both the frequency and extensive analysis demanded at Level 4A-4. He is expected to maintain good relationships with Congressional staff, public interest groups, the media, etc., in his area and the preparation and analysis typically required to do so are already credited at Level 4A-3. Similarly, his lower level contacts with INS District Directors, local or area officials of pro bono groups, lobbying associations, and professional associations are also recognized at Level 4A-3.

We evaluate this subfactor at Level 4A-3 and credit 75 points.

Subfactor 4B: Purpose of Contacts

This subfactor includes the advisory, representational, negotiating, and commitment responsibilities related to the supervisor's contacts.

At Level 4B-3, the purpose of contacts is to justify, defend, or negotiate in representing the project, program segment(s), or organizational unit(s) directed, in obtaining or committing resources, *and* in gaining compliance with established policies, regulations, or contracts. Contacts at this level usually involve active participation in conferences, meetings, hearings, or presentations involving problems or issues of considerable consequence or importance to the program or program segment(s) managed.

At Level 4B-4, the purpose of contacts is to influence, motivate, or persuade persons or groups to accept opinions or take actions related to advancing the fundamental goals and objectives of the program or segments directed, or involving the commitment of distribution of major resources, when intense opposition or resistance is encountered due to significant organizational or philosophical conflict, competing objectives, major resources, limitations or reductions, or comparable issues. At

this level, the persons contacted are sufficiently fearful, skeptical, or uncooperative that highly developed communication, negotiation, conflict resolution, leadership, and similar skills must be used to obtain the desired results.

The appellant claims Level 4B-4 credit because he feels there is always resistance and opposition when an INS manager meets the public on sensitive and controversial issues. He states the purpose of most contacts involves defending and justifying program aims, which sometimes conflict with public sentiment.

Level 4B-4 addresses the most difficult purposes that engage an agency. It is credited, for example, when intense opposition to highly significant program issues must be overcome through highly skilled negotiation or leadership, such as when winning Congressional approval or influential public interest groups' endorsement of policies or programs they normally would oppose. As such, it goes beyond encountering resistance, explaining the purpose of programs, and responding to hostile questioning. The appellant's most difficult contacts with high ranking managers, public interest groups, journalists, etc., are typically to justify and defend his office's decisions, to commit resources, and to gain compliance on important matters, as at Level 4B-3. Unlike Level 4B-4, these contacts rarely concern such matters as his winning over public interest groups with significant political influence who strongly oppose basic goals and objectives of the asylum program.

We evaluate this factor at Level 4B-3 and credit 100 points.

Factor 5: Difficulty of Typical Work Directed

This factor covers the difficulty and complexity of the basic (mission oriented) work most typical of the organization directed, as well as other line, staff, or contracted work for which the supervisor has technical or oversight responsibility (either directly or through subordinate supervisors, team leaders, or others).

The level credited for this factor normally must constitute at least 25 percent of the workload of the organization supervised. Excluded from consideration are:

- work of lower level positions that primarily support the basic work of the unit,
- work that is graded based upon the supervisory or leader guides,
- work that is graded higher than normal because of extraordinary independence from supervision, and
- work not fully under the supervisor's authority and responsibility as defined under Factor 3.

The INS workload analysis notes the majority of the work processed by each of the nonsupervisory Asylum Officers in the office is equivalent in difficulty to the GS-12 grade level. Consequently, it constitutes at least 25 percent of the office's workload, excluding supervisory work and secretarial, computer assistant, administrative assistant, and other such support work. A GS-12 base level of work equates to Factor Level 5-7 according to the conversion table on page 24 of the guide.

There is an alternative method for determining the base level of work directed by second level supervisors. The highest grade of nonsupervisory work directed that requires at least 50 percent of the duty time of the second level supervisor may be used as the base level. However, nonsupervisory GS-13 work represents such a small portion of the office's workload that it demands little of the appellant's time to oversee.

We evaluate this factor at Level 5-7 and credit 930 points.

Factor 6: Other Conditions

This factor measures the extent to which various conditions add to the difficulty of supervision. For credit, the condition must be present and dealt with on a regular basis. Positions at Level 6-3 or below are boosted one level if they also meet at least three of the eight special situations described in the guide.

Level 6-5 addresses three situations. Level 6-5a credits complications arising from the supervision of GS-12 level work that demands, among other things, significant and extensive coordination and integration. Level 6-5b credits directing GS-13 base level work in certain situations. Level 6-5c credits managing work through subordinate supervisors who each direct substantial GS-11 level workloads requiring Level 6-4a coordination.

The appellant manages substantive work through two subordinate supervisors who each direct substantial GS-12 workloads. The work requires substantial coordination and integration on the appellant's part in reviewing and approving the substance of case documents and decisions to ensure they accurately reflect the position of the organization, as described under Level 6-4a on page 27 of the guide. Consequently, Level 6-5c is met.

Level 6-6 addresses two situations. Level 6-6a requires exceptional coordination and integration of a number of very important and complex program segments of GS-13 work. The base level of work the appellant directs is GS-12, which precludes further consideration of Level 6-6a.

Level 6-6b requires managing work through subordinate supervisors who each direct substantial GS-12 level workloads demanding Level 6-5a coordination. The Chicago Asylum Office's work does not demand the significant and extensive coordination characteristic of Level 6-5a. The work involves a high level of analysis and judgment that present substantial complications for the appellant when resolving conflicting interpretations and maintaining consistency and compatibility of his Asylum Officers' decisions. Such coordination is fully credited at Level 6-4a, (reviewing and approving the substance of case documents and decisions to ensure they accurately reflect the position of the organization), as noted above. The significantly greater complications found at Level 6-5a, which may arise when coordinating and integrating workers involved in a number of important projects or program segments, are typically absent from the work the appellant directs.

We evaluate this factor at Level 6-5c and credit 1225 points.

FACTOR LEVEL POINT SUMMARY

Factor	Level	Points
1	1-2	350
2	2-2	250
3	3-2c	450
4A	4A-3	75
4B	4B-3	100
5	5-7	930
6	6-5c	1225
	Total:	3380

The preceding table summarizes our evaluation of the appellant's work. As shown on page 31 of the guide, a total of 3380 points converts to grade GS-13 (3155-3600).

DECISION

As explained in the foregoing analysis, the proper classification of the appellant's position is Supervisory Asylum Officer, GS-930-13.