



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

Washington, DC 20415

Human Capital Leadership
and Merit System
Accountability Division

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

Appellant: [appellant]

Agency classification: Administrative Service Manager,
GS-0301-13

Organization: Facilities/Logistics/Administrative
Division
Site Support Office
Operations Directorate
Defense Finance and Accounting Service
Department of Defense
[location]

OPM decision: Support Services Supervisor,
GS-0342-13

OPM decision number: C-0342-13-01

/s/ Kevin E. Mahoney

Kevin E. Mahoney
Acting Deputy Associate Director
Center for Merit System Accountability

July 11, 2007

Date

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

Since this decision changes the classification of the appealed position, it is to be effective no later than the beginning of the fourth pay period after the date of this decision, as permitted by 5 CFR 511.702. The servicing human resources office must submit a compliance report containing the revised 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 to the OPM office that accepted the appeal.

Decision sent to:

[appellant's name and address]

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Introduction

On February 6, 2007, the Dallas Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant] whose position is currently classified as Administrative Service Manager, GS-301-13. The appellant requested his position be classified as Administrative Service Manager, GS-301-14. The position is assigned to the Facilities/Logistics/Administrative (FLA) Division, Site Support Office, Operations Directorate, Defense Finance and Accounting Service (DFAS), Department of Defense, located on the [location], in [city and state]. We received the agency's administrative report on March 30, 2007. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

General issues

The appellant compares his position to the GS-14 position held by his predecessor. 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 another that may or may not have been properly classified as a basis for deciding his appeal.

Background

The appellant informally raised the issue of being placed on a different, lower-graded position description (PD) than his predecessor twice with his former supervisor. The appellant's current supervisor presented a proposed PD with proposed classification as Administrative Service Manager, GS-301-14, to the Human Resources (HR) Shared Service Center in [city and state]. On October 10, 2006, HR responded via email that the proposed PD was correctly classified at the GS-13 level. The Center's Position Management and Classification office found the proposed PD did not support evaluating Factor 1 - Program Scope and Effect, at Level 1-3; Factor 5 - Difficulty of Typical Work Directed, at Level 5-6; and Factor 6 - Other Conditions, at Level 6-4.

Position information

DFAS was created in 1991 to reduce the cost of Department of Defense finance and accounting operations and to strengthen financial management through consolidation of finance and accounting activities across the department. DFAS consolidated over 300 installation level offices into 26 sites. This consolidation continues, and DFAS now has only five remaining major office sites. The DFAS [duty city] Site includes organizations responsible for civilian and military pay operations, debt and claims management, departmental accounting, audit functions, etc. As head of the FLA Division, the appellant is responsible for supervising the work of approximately sixty subordinate managers and staff in three functional units: the FLA Division; i.e., his direct staff, and two branches: the Programs Branch and the Most Efficient Operations (MEO) Branch. The Division provides general support services to the approximately 1,400 staff members of the DFAS [duty city] Site situated at the [location] as well as six tenants all of whom are located at the [location]. These include the Air Reserve Personnel Center, the Air Force Financial Management Center of Excellence, the Air Force Accounting and Finance Office, the

Defense Information Systems Agency (DISA) and the Department of Defense Inspector General. The total population served at the site is somewhat over 2,000 employees, contractors, and service members.

The administrative support functions provided include facilities, records management, file and/or records maintenance, supply management, mail services, printing and copier programs, acquisition and distribution of forms and publications, parking management, liaison with the site's host management staff, telephone operations, safety and occupational health, security, procurement, transportation services, Government purchase card, recycling and shredding, interservice support agreements, the travel order program, and the suggestion program. The Division provides some services to the [names of four cities and four states] sites. It also provides supply support to the civilian payroll office in [a fifth city]. The forms and publications function, the property accountability function, and automated external defibrillator program are agency-wide functions/programs.

In his appeal request to OPM, the appellant stated he was not given credit for providing mail room services, training, conference, presentation services, safety, and security for the [location]. He stated the Safety Officer supports several geographically dispersed sites, and the Accountable Property Book Officer (APBO) and the supply technicians support field sites in [names of three cities]. The Security Officer and his staff provide support to the DISA site in [city and state], as well as the [fourth city] site. The appellant's organization provides forms and publications development and fielding, the automated external defibrillator program, and property accountability support for DFAS staff throughout the agency.

The appellant is currently assigned to PD number [number]. He states that his PD is still inaccurate because it does not give him credit for support services provided to sites outside of the DFAS [duty city] Site on [location]. The PD states that he "Manages assigned corporate level programs to ensure compliance with all applicable regulations and coordinates requirements and application of assigned agency programs." Further, the agency reports the [duty city] site reporting chain moved to DFAS [a sixth city] as of January 2007. However, there is ongoing residual workload, primarily concerning property management which they considered in their evaluation. The supervisor and HR officials both recertified to the accuracy of the duties described in the PD on March 23, 2007.

A PD is the official record of the major duties and responsibilities assigned to a position by a responsible management official; i.e., a person with authority to assign work to a position. A position represents the duties and responsibilities that make up the work performed by an employee. Classification appeal regulations permit OPM to investigate or audit a position and decide an appeal on the basis of the duties assigned by management and performed by the employee. We classify a real operating position and not simply the PD. Therefore, this decision is based on the actual duties assigned by management and performed by the appellant.

To help decide this appeal, we conducted a telephone audit with the appellant on May 2, 2007, and subsequent follow-up interviews, and a telephone interview with the supervisor on May 4, 2007. In reaching our classification decision, we carefully considered all of the information gained from these interviews, as well as the written information furnished by the appellant and his agency, including the PD. We find this PD contains the major duties and responsibilities

assigned to and performed by the appellant and we hereby incorporate it by reference into this decision.

Series, title, and standard determination

The appellant does not question the title and series of his position. The agency allocated the position to the GS-301, Miscellaneous Administration and Program Series, stating the work requires a high order of analytical ability combined with a comprehensive knowledge of 1) the functions, processes, theories, and principles of management; and 2) the methods used to gather, analyze, and evaluate information. The GS-301 series was selected as the best fit for the position, considering recruitment sources and the overall skills required of the position. OPM has no prescribed titles for the 301 series, and Administrative Services Manager was selected as the most descriptive title for duties performed.

We disagree with the agency series and title determinations. The appellant's position is directly covered by the Support Services Administration Series, GS-342, which includes "all positions the primary duties of which involve supervising, directing, or planning and coordinating a variety of services functions that are principally work-supporting," with such functions including (but 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."

The Division performs some general management work but much of it is concerned with functions and programs included in a support services program. For instance, the studies conducted are process improvement studies regarding the Divisions's internal processes and customer delivery processes to develop cost saving initiatives and process improvements. Further, most of the general management functions do not entail performing substantive work in such occupational areas as personnel administration, budget, accounting, contract and procurement, or other similar occupations.

For instance, one section performs the centralized processing of personnel actions, the employee awards program, training coordination and payment, travel support, contract management for a consolidated cell phone/blackberry contract, and consolidated data input to the DFAS accounting system for all financial documents prepared by resource advisors at the [city] Site and remote supported locations, and monthly, quarterly, and annual document reconciliation and audits. Other general management services such as financial management, management analysis, procurement, contract administration, etc. are performed by different offices in the [duty city] Site Support Office or have moved to the DFAS [a fifth city] as part of the phased closure under BRAC. Human resources, for instance is now at the Human Resources Shared Service Center in [the fifth city].

The position does not meet the requirements or the intent of the GS-301 series. The GS-301 series is appropriate for positions which meet two criteria: (1) their primary work is of an administrative, two-grade interval nature, and (2) their primary work is not classifiable in any other series. Positions involving mixtures of work classifiable in more than one occupational series should be classified in the series appropriate for the paramount qualifications required. If

those qualifications requirements are equally important, the position should be classified in the series appropriate to the grade controlling duties. If the grade level of those duties is equal, the position should be classified in any of the series involved that would provide a satisfactory recruiting base. Only in rare cases will none of qualifications provide an adequate recruitment avenue. It is in these instances when the GS-301 series should be considered as a final recourse. These circumstances are not present in the instant case since the position is fully covered by the GS-342 Series Definition.

As discussed below, the position meets the requirements for classification under evaluation criteria contained in the GS-342 Position Classification Standard (PCS), as well as the requirements for classification under evaluation criteria contained in the General Schedule Supervisory Guide (GSSG). Support Services Supervisor is the title established for positions meeting either criterion.

Grade determination

Evaluation Using GS-342 Support Services Administration Series PCS

The GS-342 PCS directs that positions be graded based on application of the criteria contained in that standard, or the General Schedule Supervisory Guide, whichever is higher.

In order to be evaluated under this PCS, a position must meet the following criteria:

- a. There must be delegated authority and responsibility for the supervision of at least three employees who perform at least six of the functions described in Level A, Factor 1; and each of the employees must perform such functions for 25% of his or her time;
- b. The organization to which services are provided must be at least equivalent to Level A, Factor 2, Element 2; and
- c. The supervisory position must have been assigned duties and responsibilities at least equivalent to those described at Level A, Factor 3.

Grade-level criteria in this standard are expressed in terms of three factors: (1) Nature of Services; (2) Organizational Environment; and (3) 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 the conversion chart provided in the standard. For a position to warrant a particular point value, it must substantially meet the described criteria for that level or element.

Factor 1 - Nature of Services

This factor includes five levels designed to measure the nature and scope of the support services provided to the organization and the extent of program planning and advisory services required.

Many support services programs contain support functions or operations that are typical of more than one level. To warrant assignment of a particular level, the position must be responsible for supervision of substantial work comparable in difficulty and responsibility to that represented by the illustrative examples provided in the standard. Substantial work in support services organizations is defined as the work which the organization was established to perform.

Many of the functions supervised by the appellant correspond or are equivalent in difficulty to the routine clerical functions described at Level A (mail operations, providing duplicating services, primarily through the use of automatic quick copy equipment), or the more substantive clerical operations described at Level B (receiving, warehousing, issuing, and maintaining stock levels for a wide variety of supplies and forms, telephone management, and communications services.) However, the position includes most of the elements that are more consistent with the specialized support services functions described at Level C (space management, records management, forms management, property management, and management systems related to the functions directed.)

The position does not meet Level D. The position does not involve the performance of analyses and studies designed to determine the level of services needed by the organization as expected at Level D. For example, the appellant does not conduct "extensive fact finding and analysis" to determine special categories of supply needs (such as automation of operations or advances in laboratory equipment); to identify space requirements based on anticipated volume of operations and potential changes in functions; to set up a mail system (including automated mail handling equipment) to process very large volumes of mail (comparable to an organization that receives applications for benefits from a Statewide area); or to plan and design the graphic exhibits or printed material to be used in an organization's public information program.

Level C is credited for 24 points

Factor 2 - Organizational Environment

This factor measures the impact of the organization on the level and difficulty of the position in terms of the following three elements:

Element 1 - Nature of Demands Placed on the Support Services Programs

This element measures the complexities involved in providing services to the organization and the stability of the organization, and is expressed in terms of three described levels (Levels A, C, and E).

The position is comparable in difficulty to Level C, where the organization serviced is more complex, frequently involving satellites or different organizational levels, and where considerable adaptation and variation are necessary in the manner in which support services are provided. At this level, organizational and functional changes occur at frequent intervals and require substantial changes in both the nature and scope of the services provided (e.g., the introduction of entirely new services.) While the number of satellites the appellant's organization services is steadily shrinking (it is a Base Realignment and Closure [BRAC] site), it

provides services to elements of different commands at different organizational levels. The appellant must adapt procedures and level of support to accommodate the diverse nature of the serviced population (i.e., divided among Federal civilian employees, military service members, and contractor personnel.) Although the types of support services provided do not change substantially over time, the shifting business lines due to BRAC has, in recent years, required him to make corresponding adjustments in the services provided. Thus, in this one aspect his position falls between Levels A and C, with Level C being otherwise substantially met.

Level C is somewhat exceeded, and therefore strengthened by the appellant's agency-wide responsibilities in the forms and publications function, the property accountability function, and automated external defibrillator program. However, the position does not meet Level E, where the serviced organization comprises most or all of the functions performed by an agency, department, or bureau, is nationwide in scope, and where the support services chief is concerned primarily with policy development and program direction rather than management of operating-level support services activities. By contrast, the [duty city] site is a comparatively small component of DFAS. While the appellant may provide input to policy development related to the functions directed such as agency-wide forms development, he is chiefly concerned with management of operating-level support services activities.

Level C is credited for 8 points.

Element 2 - Scope of the Support Services Program

This element measures the scope of the support services program in terms of the total number of employees in the serviced organization.

The position falls within the Level D range (1551 to 3050 employees.)

Level D is credited for 8 points.

Element 3 - Program Coordinating Responsibilities

This element provides additional credit for those positions responsible for coordinating and reviewing support services programs and functions within subordinate or satellite organizations. To receive credit under this element the chief must:

- (1) have responsibility for coordinating all (or the preponderance) of the support services functions in the subordinate units, and
- (2) have responsibility for a, below, plus at least two more of the following responsibilities:
 - a. The chief has coordinating responsibility for at least three distinct support services programs located in subordinate organizations. Positions responsible for directing three or more decentralized support services units within the same organizational component will not meet this requirement.

- b. The chief has continuing and regular responsibility for taking and recommending action on the program plans, budgets, and policy matters of the subordinate units.
- c. The chief is responsible for review of the operation of the subordinate support services programs through on-site inspections, analysis of management reports or audits, budget reviews, etc.
- d. The chief is required to devote a substantial amount of time (e.g., 25 percent or more) to direction of the subordinate support services programs.

This does not apply to the appellant's position since he does not have responsibility for coordinating all (or the preponderance) of the support services functions in the subordinate units. He coordinates some residual support to several geographically dispersed satellites as well as agency-level program segments. No additional credit is appropriate.

Factor 3 - Level of Responsibility

This factor measures the degree of supervisory control under which the support services chief operates, and the extent of delegated authority vested in the position measuring five aspects: (1) nature and type of supervision; (2) the extent to which work is controlled by guidelines; (3) authority to recommend changes; (4) nature and purpose of personal contacts; and (5) personnel management responsibilities. Four levels are defined.

The position meets Level C in regard to the independence with which the appellant operates. His supervisor indicated he is fully relied upon to carry out the assigned functions, providing only informal progress reports on major projects or sensitive issues. The appellant is responsible for adapting procedures within the overall intent of regulatory guidelines and for participating with the higher-level policy makers in developing new program guidelines as needed. He is authorized to negotiate major changes in the level of support services to be provided or to make binding commitments for the program. The appellant coordinates the activities of subordinate supervisors and develops internal plans for career development, performance appraisal, and equal employment opportunity. Thus, Level C is met.

The position does not meet Level D, where support services chiefs are responsible for planning, establishing, and coordinating their programs within the broad administrative framework of an agency. The methodology employed and technical determinations made are typically accepted as authoritative. Review of the work is generally in terms of how well the support services program is integrated with the total administrative program of the agency. The appellant participates in planning and coordinating for three agency-wide functions and programs. This does not favorably compare with the broader responsibility, typical of Level D, in making recommendations for general administrative policy and support service program policy throughout an agency or major subordinate organization.

Unlike the appellant's position, positions at Level D have staff responsibilities for developing and maintaining operating instructions consistent with basic administrative policies of the agency and functional guidelines from applicable service agencies, such as the General Services

Administration (GSA). The appellant is subject to policy statements, constraints and controls established by the department. In contrast, Level D guidelines include the basic administrative management policies of the agency, as well as the basic orders and regulations of service agencies such as the Government Printing Office and the GSA.

At Level D, contacts are generally with top managers of other major programs or functions within the agency, in service organizations, or in private organizations. Typically, they are for the purpose of negotiating the resolution of major problems, such as impasses among subordinate supervisors or problems with top managers in other agencies concerning common support services. Contacts may also involve the negotiation of changes in the procedures and regulations of other agencies, when they have a serious impact on the assigned program.

The appellant has frequent contacts with the high-ranking functional managers and their staff at the agency headquarters over the agency-wide functions he manages or coordinates. He also has contact with higher-ranking managers, supervisors, and staff of program, administrative, and other work units throughout the [duty city] Site and remote sites, administrative staff at [location] Air Force Base, the tenants of the Annex, and the GSA, and various contractors. Unlike Level D, the purpose of many of his contacts is to negotiate the commitment of resources with the high-ranking functional managers over the agency-wide functions he manages or coordinates. For instance, the Accountability Property Officer has duties at the [duty city] Site and two of the remote sites, so the appellant resolves the amount of time she will spend on agency-level duties with the Director of Fiscal Services, Agency Enterprise Office. He actively participates in conferences, meetings, and presentations involving problems or issues of considerable consequence or importance to support services programs such as those affecting the services to be continued or transferred and the timing of such actions throughout the BRAC process. While significant, these contacts are not for the more contentious and far-reaching issues dealt with at Level D.

The personnel management responsibilities fully meet but do not exceed Level C.

Level C is credited for 32 points.

Summary of Factors

Factor	Level	Points
1. Nature of Services	C	24
2. Organizational Environment		
Element 1	C	8
Element 2	D	8
Element 3 - -	N/A	0
3. Level of Responsibility	C	<u>32</u>
Total		72

The total of 72 points for the three factors falls within the GS-11 point range (72-76) on the grade conversion chart provided in the standard.

Evaluation Using the GSSG

This guide uses a factor-point evaluation method that assesses six factors common to all supervisory positions. To grade a position, each factor is evaluated by comparing the position to the factor level definitions for that factor and crediting the points designated for the highest factor level which is met in accordance with the instructions specific to the factor being evaluated. The total points accumulated under all factors are then converted to a grade by using the point-to-grade conversion table in the guide. The appellant disagrees with the agency's evaluation of Factors 1, 5, and 6. Therefore, this decision will address those factors with greater depth. The appellant does not contest the agency's determination for Factors 2, 3, and 4. We have reviewed those factors and agree with the levels credited.

Factor 1, Program Scope and Effect

This factor assesses the general complexity, breadth, and impact of the program areas and work directed, including the organizational and geographic coverage. It also assesses the impact of the work both within and outside the immediate organization. To credit a particular factor level, the criteria for both scope and effect must be met.

a. Scope

This element addresses the general complexity and breadth of: (1) the program (or program segment) directed; and (2) the work directed, the products produced, or the services delivered. The geographic and organizational coverage of the program (or program segment) within the agency structure is considered under Scope.

At Level 1-2, the program segment or work directed is administrative, technical, complex clerical, or comparable in nature. The services provided have limited geographic coverage and support most of the activities comprising a typical agency field office, an area office, a small to medium military installation, or comparable activities within agency program segments.

At Level 1-3, the supervisor directs a program segment that performs technical, administrative, protective, investigative, or professional work. The program segment and work directed typically have coverage which encompasses a major metropolitan area, a State, or a small region of several States; or, when most of an area's taxpayers or businesses are involved, coverage comparable to a small city. Providing complex administrative, technical, or professional services directly affecting a large or complex multimission military installation is also creditable at this level.

A large military installation is defined in the GSSG as a military base with one or a few missions or a group of activities with a total serviced or supported employee-equivalent population exceeding 4,000 personnel, and with a variety of serviced technical functions. These personnel are directly affected by the position under evaluation. Federal civilian and military employees,

estimated contractor personnel, volunteers, and similar personnel may be used to derive the population total.

A complex, multimission installation includes four or more of the following: (1) a garrison; (2) a medical center or large hospital and medical laboratory complex; (3) annual multimillion dollar construction, civil works, or environmental cleanup projects; (4) a test and evaluation center or research laboratory of moderate size; (5) an equipment or product development center; (6) a service school; (7) a major command higher than that in which the servicing position is located or a comparable tenant activity of moderate size; (8) a supply or maintenance depot; or equivalent activities.

The appellant indicates the services he directs support a complex multimission organization (that is, [location]), and he also serves an active, reserve, and retired military, national guard, and dependent population of 86,000 in the [duty city] area through the Pass and ID Card Office. This Office provides a small portion of the range of various services that are available to these individuals in the [duty city] area and is not reflective of the overall scope of the Division's program. The appellant said only about 3,000 identification cards were provided last year and this was a very intense year because the cards were changed. We note nature of the work involved in issuance of ID cards would not exceed that typically covered at Level 1-2.

The appellant directs administrative and complex clerical activities comparable to Level 1-2 in scope. The serviced population totals about 3,750 positions, and of these, full service is provided to only the 2,000 or so personnel who are duty-stationed at the [duty location]. This is comparable in size to the types of organizations cited at Level 1-2 rather than to those at Level 1-3. The population directly serviced by the appellant's position (i.e., [duty location]) does not meet the definitions for a large or complex multimission military installation. It does not approach the examples either in terms of their magnitude (i.e., over 4,000 employees) or their complexity (i.e., a number of major organizational components with disparate missions and functions.) The agency-wide functions and programs; i.e., forms and publications, property accountability, and automated external defibrillator constitute a limited a portion of the support services provided by the appellant's division and may not control the evaluation of this element.

b. Effect

This element addresses the impact of the work, the products, and/or the programs described under "Scope" on the mission and programs of the customer(s), the activity, other activities in or outside of the Federal Government, the agency, other agencies, the general public, or other entities.

At Level 1-2, the services or products support and significantly affect installation-level, area-office level, or field-office operations and objectives, or comparable program segments; or provide services to a moderate, local, or limited population of clients or users comparable to a major portion of a small city or rural county. An example of this kind of effect would be directing budget, staffing, supply, protective, library, payroll, or similar services which support a small Army, Navy, or Air Force base with no extensive research, development, testing, or comparable missions, a typical national park, a hospital, or a nondefense agency field office of moderate size and limited complexity.

At Level 1-3, activities, functions, or services accomplished directly and significantly impact a wide range of agency activities, the work of other agencies, the operations of outside interests, or the general public. At the field activity level (involving large, complex, multimission organizations and/or very large serviced populations), the work directly involves or substantially impacts the provision of essential support operations to numerous, varied, and complex technical, professional, and administrative functions. An example of this kind of effect could include the level of support provided by the chief personnel or budget officer for a bureau or major military command headquarters, a large or complex multimission military installation, or an organization of similar magnitude.

The effect of the appellant's position meets but does not exceed Level 1-2. As discussed under the *Evaluation Using GS-342 Support Services Administration Series PCS*, the functions supervised by the appellant primarily involve clerical and administrative support functions such as mail operations; receiving, warehousing, issuing, maintaining stock levels for a wide variety of supplies and forms; space management; records management; forms management; and property management. Such services are also provided to the six tenants the FLA Division supports. These functions are not comparable to the complex administrative, or technical, or professional services typical of 1-3. Furthermore, the organizations supported by the Division do not comprise a complex, multimission installation. . None of the individual components of the [location], or the other sites serviced are equivalent to any of the eight organizational components previously discussed under Scope.

The appellant's position is primarily responsible for directing primarily clerical and administrative support services whose direct effect is primarily internal to the organization. The services provided are comparable to the installation-level or area office-level operations cited at Level 1-2. Although a few functions/programs (forms and publications, property accountability, and automated external defibrillator) have agency-wide impact, they do not represent the full range of support services the Division provides and are not reflective of the primary purpose of the Division's existence. Thus, the services provided do not directly and significantly impact a wide range of agency activities, the work of other agencies, the operations of outside interests, or the general public as expected at Level 1-3.

At the field activity level, Level 1-3 would be represented by the director of an entire personnel management program, budget administration program, or supply operation for a bureau, major military command headquarters, or large or complex multimission military installation. In contrast, the appellant's work products do not directly support or substantially impact the provision of essential support operations to numerous, varied, and complex technical, professional, and administrative functions of the scope and complexity that would typically exist at a large, complex, multimission organization as defined under Scope.

Level 1-2 is credited for 350 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, 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.

Under the GSSG, the base level of work supervised by second-level supervisors may be determined in two different ways. First, the method used for first-level supervisors can be used to determine the correct base level of work for second (and higher) level supervisors as well. Using this method, the base level of the typical work directed is the highest grade which: (1) best characterizes the nature of the basic (mission-oriented) nonsupervisory work performed or overseen by the organization directed and (2) constitutes 25 percent or more of the workload or duty time of the organization. Excluded from consideration in determining the base level are positions whose grades are based on the GSSG, or the Work Leader Grade-Evaluation Guide, and lower-level positions that primarily support the basic work of the unit.

In addition to the appellant, there are 62 positions in the FLA Division, representing a mix of Federal employees and contractors. Of these, excluded from consideration under the base level are four supervisory positions (the Operations Support Manager, GS-301-13; Supervisory Financial Management Specialist, GS-501-11; Administrative Services Manager, GS-342-10; and Mail Manager, GS-301-9.); two lead positions (the Lead Mail Clerk, GS-305-5 and the Lead File Clerk, GS-305-5); plus two lower graded clerical support (a GS-305-3 and GS-303-4) and one WG-3502-2 laborer position. As a general measurement, the position's Federal Wage System (FWS) subordinate position graded as a Motor Vehicle Operator, WG-5703-6 was considered equivalent to GS-5 and the FWS subordinates graded at WG-5 (two Materials Handlers-WG-6907) were considered equivalent to GS-4. Positions were assumed to spend 100 percent of their time on work classifiable at their actual grade levels, although as a practical matter, most positions spend at least a portion of their time on lower-graded work.

Of the 53 remaining staff positions, four are at the GS-12 grade level, six at GS-11, nine at GS-9, and fourteen at GS-7. The percent of nonsupervisory mission-oriented workload at each grade level is shown below.

GS-12	7.7 percent
GS-11	11.5 percent
GS-9	17.3 percent
GS-7	26.9 percent
GS-6 and below	36.5 percent

The base level of work supervised is GS-9, the highest level constituting 25 percent or more of the workload of the unit.

In his analysis of this factor, the appellant looks at each unit of his division separately. The base level of work supervised is derived from looking at the organization supervised as a whole. In cases where a heavy supervisory or managerial workload related to work above the base level is

present, an alternative method defined in the GSSG may be used to determine the base level for second- (and higher-) level supervisors. In such cases, the highest grade of nonsupervisory work directed that requires at least 50 percent of the duty time of the supervisory position may be used as the base level, provided that it results in sound grade-level alignment with other supervisory positions in the organization and agency.

We do not find the alternative method appropriate for this position. The Division includes ten nonsupervisory positions above the base level of GS-9. Five report directly to the appellant. These positions all operate with substantial freedom from supervision, which is critical in supporting their grades and makes it unlikely the appellant would be required to devote more than 50 percent of his time to their supervision. Further, they are in specialized fields; i.e., Safety and Occupational Health, Financial Management, Inventory Management, and Security, which would limit the level of technical supervision provided to some or all of them.

According to the chart provided in the GSSG, if the highest level of base work is GS-9, the factor level to be credited is Level 5-5.

Level 5-5 is credited for 650 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.

Level 6-3a indicates that supervision and oversight requires coordination, integration, or consolidation of administrative, technical, or complex technician or other support work comparable to GS-9 or 10, or work at the GS-7 or 8 where the supervisor has full and final technical authority. Directing the work at this level (cases, reports, studies, regulations, advice to clients, etc.) requires consolidation or coordination similar to that described at Level 6-2a, but at a higher level of work.

Level 6-3b covers positions which direct subordinate supervisors over positions in grades GS-7 or 8 which requires consolidation or coordination similar to that described at Level 6-2a within or among subordinate units. Such coordination is required to ensure consistency of product, service, interpretation, or advice, and conformance to formal standards or agency policy.

Level 6-4b covers positions that direct subordinate supervisors and/or contractors who each direct substantial workloads comparable to the GS-9 or 10 level. Such base work requires coordination similar to that described at Level 6-3a for first-line supervisors. This coordination of analytical, interpretive, or judgmental work places significant demands on the supervisor to resolve conflicts and maintain compatibility of interpretation, judgment, and policy application, because the basic facts, information, and circumstances often vary substantially; guidelines are incomplete; or differences in judgments, interpretations, or decisions can have consequences or impact the work of other subordinates.

The first distinction between these two levels for second-level supervisors is in the grade level of the basic work of the organization. Level 6-4b imposes the additional requirement that the subordinate supervisors *each* direct substantial workloads at GS-9 or 10. Of the four subordinate supervisors, only two directly supervise substantial workloads at GS-9 or 10. The GS-301-13 in the Programs Branch has 80 percent of his currently occupied nonsupervisory positions; i.e., eight staff years, at or above that level. The GS-342-10, in the MEO has 41 percent of current direct staff of 12 at the GS-9 level. The GS-501-11 has only 9 percent of her direct staff of 12 at the GS-9 level, while none of the GS-301 Mail Manager's staff of 11 is at the GS-9 level. The nature of the discrete functions and work performed within these components causes us to conclude redistribution of work would not result in an acceptable structure to accomplish the organization's mission permitting *each* subordinate supervisor to direct a substantial workload of GS-9 or 10. Therefore, the position does not meet Level 6-4b. As such, Level 6-3 is the highest level under this factor which is fully met by the appellant's position.

Special Situations

The GSSG instructs that if the level selected under this factor is 6-1, 6-2, or 6-3, a single level may be added if 3 or more of the following special situations apply:

1. Variety of Work – Applicable. Work involves a number of different series engaged in a number of functions and programs including facilities, records, supply, and property management; forms and publications development and distribution; safety and occupational health; security; and mail services.
2. Shift Operations – Not applicable.
3. Fluctuating Work Force or Constantly Changing Deadlines – Not Applicable. Although the [duty city] Site is under BRAC, the division has been unable to fill key vacancies while receiving employees from other offices that have closed. While some of these employees have experience that is not directly related to the work of the Division, there have not been large fluctuations in size (e.g., when there are significant seasonal variations in staff.)
4. Physical Dispersion – Not applicable. The appellant's staff is spread out in four buildings at the [duty city] Site, one of which is in a large warehouse, and at a DISA site in the [duty city] Technical Center. However, he serves as a second-level supervisor for these functions and is available by telephone and e-mail.
5. Special Staffing Situations – Not applicable. There is no regular and substantial involvement in special employment programs (e.g., handicapped or student employment or the employment of lower skilled workers) requiring special training, counseling, or motivational activities.
6. Impact of Specialized Programs – Applicable. There are 10 nonsupervisory employees performing work above the GS-9 base level.

7. Changing Technology – Not applicable. The appellant's work operations are not significantly and constantly impacted by new technology, such that extensive training of the subordinate staff would be required.

8. Special Hazard and Safety Conditions – Not applicable. The record does not show these types of conditions in the appellant's work place as would be the case for such organizations as public safety and fire protection and prevention.

Because only two special situations are applicable to the appellant's position, no additional credit can be allowed under this factor.

Level 6-3 is credited for 1120 points.

Summary

Factor	Level	Points
1. Program Scope and Effect	1-2	350
2. Organizational Setting	2-2	250
3. Supervisory and Managerial Authority Exercised	3-3	775
4. Personal Contacts		
4A. Nature of Contacts	4A-3	75
4B. Purpose of Contacts	4B-3	100
5. Difficulty of Technical Work Directed	5-5	650
6. Other Conditions	6-3	975
Total		3175

The total of 3175 points falls within the GS-13 range (3155-3600 points) on the point-to-grade conversion chart provided in the GSSG.

Decision

The appealed position is properly classified as Support Services Supervisor, GS-342-13.