OFFICE OF PERSONNEL MANAGEMENT
ATLANTA OVERSIGHT DIVISION
ATLANTA, GEORGIA

CLASSIFICATION APPEAL DECISION

Under section 5112(b) of title 5, United States Code

Appellant: [Appellant]

Position: Administrative Officer
GS-341-12

Organization: Office of the Superintendent of the
Domestic Dependent Elementary and
Secondary Schools
[installation] Dependents Schools
Marine Corps Base
[installation city state]

Decision: Administrative Officer
GS-341-12
(Appeal denied)

OPM decision number: C-0341-12-01

Kathy W. Day Date: 5/14/97
Classification Appeals Officer

rd#034127A.AT
**Background**

On January 22, 1997, the Atlanta Oversight Division, Office of Personnel Management, accepted an appeal for the position of Administrative Officer, GS-341-12, Office of the Superintendent of the Domestic Dependent Elementary and Secondary Schools, [installation]. The appellant is requesting that his position be changed to GS-13.

The appeal has been accepted and processed under section 5112(b) of title 5, United States Code. This is the final administrative decision on the classification of the position subject to discretionary review only under the limited conditions and time outlined in part 511, subpart F, of title 5, Code of Federal Regulations.

**Sources of Information**

This appeal decision is based on information from the following sources:

1. Correspondence from the appellant dated January 17, 1997, appealing the classification of his position, and correspondence dated February 27 and 28, 1997, providing additional position information.

2. The agency’s letter of February 20, 1997, providing position and organizational information.

3. A telephone interview with the appellant on April 21, 1997.

4. A telephone interview with the appellant’s supervisor, on May 12, 1997.

**Position Information**

The appellant is assigned to Position Number XDCRU. The appellant, supervisor, and agency have certified to the accuracy of the position description.

The appellant provides administrative support to the Superintendent, Central Office, and school based administrators in areas of logistics, procurement, contracting, contract administration, transportation, maintenance, safety, and parent and student contacts. He also acts as the Superintendent’s designee and liaison with the Human Resources Office Site Office for Labor-Management in matters concerning support personnel.

The appellant oversees the school system transportation program and the buildings and grounds maintenance of all schools and buildings in the system. He is responsible for the Internal Management Control Program and inventory control. He oversees all procurement of goods and services for the school ensuring compliance with Federal Acquisition Regulations and statutory requirements. The appellant administers the support personnel collective bargaining agreement, hears second stage grievances, facilitates disputes, and prepares resolution documents. He chairs the Student Disciplinary Advisory Board,
oversees and writes school policies, directives, and instructions as requested, and briefs parents on matters concerning transportation, facility maintenance, safety, etc. He is the point of contact and advisor for EEO issues and is the Safety Officer.

The appellant supervises a Maintenance Supervisor, WS-4749-09; Transportation Supervisor, AD-5703-00; Purchasing Agent, GS-1105-05; and Office Automation Clerk, AD-0322-03. He is a second level supervisor for 26 bus drivers and 6 maintenance personnel. He is responsible for the full range of supervisory duties.

This position is supervised by the Superintendent of the [installation] Dependents Schools who establishes goals and objectives. The appellant independently plans and performs work, setting deadlines and priorities and determining the methodology to be used. His work is reviewed for overall effectiveness.

Standards Referenced

Administrative Officer Series, GS-341, August 1966.

Series and Title Determination

The appellant does not contest the placement of his position in the Administrative Officer Series, GS-341, which covers positions responsible for providing or obtaining a variety of management services essential to the direction and operation of an organization. We agree that the GS-341 series is the most appropriate series for the appellant’s position. The GS-341 standard states that the title Administrative Officer is the proper title for all non-trainee positions.

The appellant’s position is properly titled and coded as Administrative Officer, GS-341.

Grade Determination

The Administrative Officer Series standard does not include grade-level criteria. Rather, the standard instructs that these positions be evaluated using the standards for the various kinds of work related to the major duties or functions, depending on what aspects of a particular position are predominant and/or represent the highest grade level of work performed. Guidance provided in the Introduction to the Position Classification Standards states that for those positions that involve performing different kinds of work, an individual category of work or type of function may be considered grade-controlling only if it is performed for at least 25 percent of the time and if the duties are a regular and recurring part of the job.
Administrative Analysis Grade Evaluation Guide:

The appellant has a variety of administrative responsibilities requiring him to gather facts, analyze situations, review documents for compliance with rules and regulations, and advise management. He is responsible for ensuring the EEO program meets basic regulatory requirements; serves as the security manager for review of suitability material; oversees the Internal Management Control Program which assesses all functions in the school system; administers the tuition assistance program; reviews, revises, and writes school policies; analyzes and advises the Superintendent on a range of parent/student issues; oversees the school safety program; develops proposals; and responds to complaints and inquiries.

The Administrative Analysis Grade Evaluation Guide provides grade level criteria for nonsupervisory staff administrative analytical, planning, and evaluative work at grade GS-9 and above. Typical positions covered by this guide require knowledge of (1) the overall mission, functions, and organization of the agency or component; (2) the principles, functions, and processes of management and the organization of work; (3) agency program operations, processes, goals, and objectives; and (4) evaluative, planning, and analytical processes and techniques. Knowledge is applied in a staff advisory capacity to line management in support of planning, development, and execution of agency programs; the administrative management of agencies and their component organizations; or the performance of related functions. The standard is written in the Factor Evaluation System (FES) format. Under the FES, positions are placed in grades on the basis of their duties, responsibilities, and the qualifications required as evaluated in terms of nine factors common to nonsupervisory General Schedule positions.

A point value is assigned to each factor based on a comparison of the position's duties with the factor-level descriptions in the standard. The factor point values mark the lower end of the ranges for the indicated factor levels. For a position factor to warrant a given point value, it must be fully equivalent to the overall intent of the selected factor-level description. If the position fails in any significant aspect to meet a particular factor-level description in the standard, the point value for the next lower factor level must be assigned, unless the deficiency is balanced by an equally important aspect which meets a higher level. The total points assigned are converted to a grade by use of the grade conversion table in the standard.

Under FES, positions which significantly exceed the highest factor level or fail to meet the lowest factor level described in a classification standard must be evaluated by reference to the Primary Standard, contained in Appendix 3 of the Introduction to the Position Classification Standards. The Primary Standard is the "standard-for-standards" for FES.
Factor 1 - Knowledge Required By The Position:

This factor measures the nature and extent of information or facts that a worker must understand to do acceptable work, such as the steps, procedures, practices, rules, policies, theories, principles, and concepts; and the nature and extent of the skills needed to apply this knowledge.

At Level 1-7, in addition to the knowledge of the previous level, assignments require knowledge and skill in applying analytical and evaluative methods and techniques to issues or studies concerning the efficiency and effectiveness of program operations carried out by administrative or professional personnel, or substantive administrative support functions (i.e., internal activities or functions such as supply, budget, procurement, or personnel which serve to facilitate program operations). This level includes knowledge of pertinent laws, regulations, policies, and precedents which affect the use of program and related support resources in the area studied. Projects and studies typically require knowledge of the major issues, program goals and objectives, work processes, and administrative operations of the organization. Knowledge is used to plan, schedule, and conduct projects and studies to evaluate and recommend ways to improve the effectiveness and efficiency of work operations in a program or support setting. The assignments require knowledge and skill in adapting analytical techniques and evaluation criteria to the measurement and improvement of program effectiveness and/or organizational productivity. Knowledge is applied in developing new or modified work methods, organizational structures, records and files, management processes, staffing patterns, procedures for administering program services, guidelines and procedures, and automating work processes for the conduct of administrative support functions or program operations. Knowledge may also be applied in analyzing and making recommendations concerning the centralization or decentralization of operations.

Level 1-7 is met. The appellant is the Administrative Officer responsible for a wide range of programs in support of the dependent schools including purchasing, logistics, internal management, safety, and buildings and grounds maintenance. He assesses needs and monitors all purchasing; oversees the school system transportation program; develops scopes of work and prepares proposals; assesses all functions in the school system for vulnerability to fraud and waste and develops programs to reduce risks; administers the collective bargaining contract, hears grievances and prepares responses; oversees tuition assistance requests; chairs the student disciplinary board and makes recommendations on strategies to handle problems; and assesses compliance with environmental safety requirements and develops an overall program. He must understand the program goals and objectives, work processes, and administrative operations of the dependent schools and be knowledgeable of pertinent laws, rules, and regulations applicable to government acquisition, labor-management relations, personnel, EEO, environmental safety, contracting, etc. The appellant’s duties are comparable to those described at Level 1-7.
Level 1-8 is the level of the expert analyst who has mastered the application of a wide range of qualitative and/or quantitative methods for the assessment and improvement of program effectiveness or the improvement of complex management processes and systems. In addition to knowledge of the next lower level, this level requires comprehensive knowledge of the range of administrative laws, policies, regulations, and precedents applicable to the administration of one or more important public programs. Typically, this includes knowledge of agency program goals and objectives, the sequence and timing of key program events and milestones, and methods of evaluating the worth of program accomplishments. Work requires knowledge of relationships with other programs and key administrative support functions within the employing agency or in other agencies. Knowledge characteristic of this level are applied in a variety of ways. For example, knowledge is applied to the design and conduct of comprehensive management studies where the boundaries of the studies are extremely broad and difficult to determine in advance. Study objectives are to identify and propose solutions to management problems which are characterized by their breadth, importance, and severity, and for which previous studies and established management techniques are frequently inadequate. For other assignments, knowledge may be applied in preparing recommendations for legislation to change the way programs are carried out; in evaluating the content of new or modified legislation for projected impact upon agency programs and resources; and/or in translating basic legislation into program goals, actions, and services. Also included at this level is skill to plan, organize, and direct team study work and to negotiate effectively with management to accept and implement recommendations, where the proposals involve substantial agency resources, require extensive changes in established procedures, or may be in conflict with the desires of the activity studied.

Level 1-8 is not met. This level addresses positions with much broader program responsibilities than the appellant’s. At this level, programs and decisions significantly change, interpret, or develop important public policies or deal with extremely complex problems requiring the application of theoretical concepts. The appellant’s program responsibilities are confined to the Camp Lejeune dependent schools and do not have the far reaching impact or complexity envisioned at this level.

Level 1-7 is credited for this factor for 1250 points.

Factor 2 - Supervisory Controls:

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility for carrying out assignments, and how completed work is reviewed.

At Level 2-4, within a framework of priorities, funding, and overall project objectives, the employee and supervisor develop a mutually acceptable project plan which typically includes identification of the work to be done, the scope of the project, and deadlines for its
completion. Within the parameters of the approved project plan, the employee is responsible for planning and organizing the study, estimating costs, coordinating with staff and line management personnel, and conducting all phases of the project. This frequently involves the definitive interpretation of regulations and study procedures, and the initial application of new methods. The employee informs the supervisor of potentially controversial findings, issues, or problems with widespread impact. Completed projects, evaluations, reports, or recommendations are reviewed by the supervisor for compatibility with organizational goals, guidelines, and effectiveness in achieving intended objectives. Completed work is also reviewed critically outside the employee’s immediate office by staff and line management officials whose programs and employees would be affected by implementation of the recommendations.

Level 2-4 is met. Similar to this level, the appellant receives his assignments in broad terms and is expected to plan and carry out those assignments without further supervisory assistance. He is responsible for interpreting and applying a number of regulations, evaluating numerous programs and issues, and making recommendations to the Superintendent which ultimately impact the faculty, staff, and students at the schools.

At Level 2-5, as a recognized authority in the analysis and evaluation of programs and issues, the employee is subject only to administrative and policy direction concerning overall project priorities and objectives. At this level, the employee is typically delegated complete responsibility and authority to plan, schedule, and carry out major projects concerned with the analysis and evaluation of programs or organizational effectiveness. The employee typically exercises discretion and judgment in determining whether to broaden or narrow the scope of projects or studies. Analyses, evaluations, and recommendations developed by the employee are normally reviewed by management officials only for potential influence on broad agency policy objectives and program goals. Findings and recommendations are normally accepted without significant change.

Level 2-5 is not met. This level reflects administrative supervision only, with full technical authority delegated to the employee. While the appellant has significant responsibility for numerous programs and functions, the Superintendent is ultimately responsible for the administration of the [installation] dependent schools and exercises substantial program controls such as analyzing policies from higher authorities; formulating and issuing policies that govern the school system; and exercising normal supervisory controls such as planning and assigning work, setting priorities, and giving program guidance. Level 2-4 involves a high degree of independence and responsibility, and thus, fully recognizes the level of responsibility vested in the appellant’s position.

Level 2-4 is credited for this factor for 450 points.
Factor 3 - Guidelines:

This factor covers the nature of guidelines used, and the judgment needed to apply them.

At Level 3-3, guidelines consist of standard reference material, texts, and manuals covering the application of analytical methods and techniques and instructions and manuals covering the subjects involved. Analytical methods contained in the guidelines are not always directly applicable to specific work assignments. However, precedent studies of similar subjects are available for reference. The employee uses judgment in choosing, interpreting, or adapting available guidelines to specific issues or subjects studied. The employee analyzes the subject and the current guidelines which cover it and makes recommendations for changes. Included at this level are work assignments in which the subject studied is covered by a wide variety of administrative regulations and procedural guidelines. In such circumstances, the employee must use judgment in researching regulations and in determining the relationship between guidelines and organizational efficiency, program effectiveness, or employee productivity.

Level 3-3 is met. The appellant’s guidelines include established policy and regulations governing such things as the acquisition of supplies and services, collective bargaining, equal employment, environmental safety requirements, building specifications, contracting, fraud and waste in government, and security. The guides consist of Federal and Department of Defense Acquisition Regulations, Federal Labor Statutes, personnel policies, Domestic Dependent Elementary and Secondary Schools (DDESS) instructions and directives, Environmental Protection Agency regulations and procedures, and other program specific regulations and directives. Judgment is required in selecting the appropriate guideline for application and in interpreting the guideline in light of the specific issues under study. This is comparable to the application of a wide variety of administrative regulations cited at Level 3-3 and meets the intent of that level.

At Level 3-4, guidelines consist of general administrative policies and management and organizational theories which require considerable adaptation and/or interpretation for application to issues and problems studied. At this level, administrative policies and precedent studies provide a basic outline of the results desired, but do not go into detail as to the methods used to accomplish the project. Administrative guidelines usually cover program goals and objectives of the employing organization, such as agency controls on size of work force, productivity targets, and similar objectives. Within the context of broad regulatory guidelines the employee may refine or develop more specific guidelines such as implementing regulations or methods for the measurement and improvement of effectiveness and productivity in the administration of operating programs.

Level 3-4 is not met. Unlike this level, the appellant’s guidelines consist of established policies and published regulations which are directly applicable to his assignments, although they may require some interpretation. This represents a more detailed and specific type of
guidance available to the appellant than the general administrative guidelines and management theories described at Level 3-4, and this level is not creditable.

Level 3-3 is credited for this factor for 275 points.

**Factor 4 - Complexity:**

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

At Level 4-4, the work involves gathering information, identifying and analyzing issues, and developing recommendations to resolve substantive problems of effectiveness and efficiency of work operations in a program or program support setting. This is in addition to improving conditions of a procedural nature which relate to the efficiency of organizations and workers described at the previous level. Work at this level requires the application of qualitative and quantitative analytical techniques which frequently require modification to fit a wider range of variables. Subjects and projects assigned at this level usually consist of issues, problems, or concepts which are not always susceptible to direct observation and analysis. Difficulty is encountered in measuring effectiveness and productivity due to variations in the nature of administrative processes studied. Information about the subject is often conflicting or incomplete, cannot readily be obtained by direct means, or is otherwise difficult to document. For example, assignments may involve compiling, reconciling, and correlating voluminous workload data from a variety of sources with different reporting requirements and formats, or the data must be carefully cross-checked, analyzed, and interpreted to obtain accurate and relevant information. Characteristic of this level is originality in refining existing work methods and techniques for application to the analysis of specific issues or resolution of problems. For example, the employee may revise methods for collecting data on workload, adopt new measures of productivity, or develop new approaches to relate productivity measurements to a performance appraisal system.

Level 4-4 is met. The appellant’s work involves various duties which require many different and unrelated processes and methods, as well as substantive issues relating to the efficiency and effectiveness of program operations. He may have to assess unusual circumstances (e.g., unexpected facility damage caused by weather which necessitates unscheduled and unbudgeted repairs; disgruntled parents when bus service to a school is canceled), determine what options are available and plan his method of approach. He must make many decisions based on his interpretation of a considerable amount of data (e.g., purchasing needs as related to budget and program priorities; information from faculty, staff, students and parents which can affect disciplinary actions recommended by the Student Disciplinary Advisory Board; compliance issues as related to building and ground needs and budget restrictions). It is the appellant’s responsibility to come up with ways to resolve problems in all of his program areas that are within existing rules and regulations.
At Level 4-5, the work consists of projects and studies which require analysis of interrelated issues of effectiveness, efficiency, and productivity of substantive mission-oriented programs. Typical assignments require developing detailed plans, goals, and objectives for the long-range implementation and administration of the program, and/or developing criteria for evaluating the effectiveness of the program. Decisions about how to proceed in planning, organizing, and conducting studies are complicated by conflicting program goals and objectives which may derive from changes in legislative or regulatory guidelines, productivity, and/or variations in the demand for program services. Assignments are further complicated by the need to deal with subjective concepts such as value judgments; the fact that the quality and quantity of actions are measurable primarily in predictive terms; and the fact that findings and conclusions are highly subjective and not readily susceptible to verification through replication of study methods or reevaluation of results. Decisions regarding what needs to be done include major areas of uncertainty in approach, methodology, or interpretation and evaluation processes resulting from such elements as continuing changes in the program, technological developments, unknown phenomena, or conflicting requirements. Under these circumstances, the employee develops new information and establishes criteria to identify and measure program accomplishments, develops methods to improve the effectiveness with which programs are administered, or develops new approaches to program evaluation which serve as precedents to others.

Level 4-5 is not met. While the appellant’s assignments often involve significant issues and problems relating to individual programs, his assignments typically do not involve implementation and operation of entire programs but are more concerned with the methods and practices used in those programs. His work concerns the administrative functions supporting the mission-oriented program (i.e., the dependents schools). The conflicting goals described at Level 4-5 are not generally present in the appellant’s position. Also, the judgments and decisions which he is called on to make do not involve the degree of uncertainty described at that level.

Level 4-4 is credited for this factor for 225 points.

Factor 5 - Scope and Effect:

This factor covers the relationship between the nature of the work, as measured by the purpose, breadth, and depth of the assignment, and the effect of work products or services both within and outside the organization.

At Level 5-3, the purpose of the work is to plan and carry out projects to improve the efficiency and productivity of organizations and employees in administrative support activities. Employees at this level identify, analyze, and make recommendations to resolve conventional problems and situations. Completed reports and recommendations influence decisions by managers concerning the internal administrative operations of the organizations and activities studied.
Level 5-3 is met. The purpose of the appellant’s work is to provide a variety of conventional administrative and program support activities to the [installation] dependents schools and to evaluate the effectiveness of those activities. This work contributes to the overall accomplishment of the DDESS mission by ensuring that appropriate systems, procedures, and controls are in place. These program support activities significantly affect the mission of the dependents school system.

At Level 5-4, the purpose of the work is to assess the productivity, effectiveness, and efficiency of program operations or to analyze and resolve problems in the staffing, effectiveness and efficiency of administrative support and staff activities. Work involves establishing criteria to measure and/or predict the attainment of program or organizational goals and objectives. Work at this level may also include developing related administrative regulations, such as those governing the allocation and distribution of personnel, supplies, equipment, and other resources, or promulgating program guidance for application across organizational lines or in varied geographic locations. Work that involves the evaluation of program effectiveness usually focuses on the delivery of program benefits at the operating level. Work contributes to the improvement of productivity, effectiveness, and efficiency in program operations and/or administrative support activities at different echelons and/or geographical locations within the organization. Work affects the plans, goals, and effectiveness of missions and programs at these various echelons or locations. Work may affect the nature of administrative work done in components of other agencies.

Level 5-4 is not met. Although the appellant’s duties are similar to this level in terms of providing administrative support, assessing program operations, and resolving problems, his responsibilities rest with the dependents schools’ programs and do not cross organizational lines, affect a wide range of agency activities, or impact the operations of other agencies as envisioned at this level.

Level 5-3 is credited for this factor for 150 points.

Factor 6 - Personal Contacts and Factor 7 - Purpose of Contacts:

These factors measure the nature and purpose of face-to-face contacts and telephone dialogue with persons not in the supervisory chain. The same contacts must serve as the basis for the level selected under both factors.

Personal Contacts:

At Level 3, contacts are with persons outside the agency which may include consultants, contractors, or business executives in a moderately unstructured setting. This level may also include contacts with the head of the employing agency or program officials several managerial levels removed from the employee when such contacts occur on an ad hoc basis. The Primary Standard describes contacts in a moderately unstructured setting as those not
established on a routine basis; the purpose and extent of each contact is different; and the role and authority of each party is identified and developed during the course of the contact.

Level 3 is met. The appellant’s contacts are with administrators, supervisors, union officials, employees, School Board members, parents, students, headquarters officials, contractors, and [installation] personnel. The contacts are not frequently structured and the content and extent are normally established depending on the situation at hand.

At Level 4, contacts are with high-ranking officials such as other agency heads, top Congressional staff officials, state executive or legislative leaders, mayors of major cities, or executives of comparable private sector organizations.

Level 4 is not met. The appellant does not routinely have contact with the types of individuals described at this level.

Level 3 is credited for this sub-factor.

**Purpose of Contacts:**

At Level c, the purpose of contacts is to influence managers or other officials to accept and implement findings and recommendations on organizational improvement or program effectiveness. The employee may encounter resistance due to such issues as organizational conflict, competing objectives, or resource problems.

Level c is met. The appellant may have to influence faculty and staff to accept decisions or procedures that are not necessarily desirable in their opinions (e.g., specific procedures for destroying hazardous materials at the school such as chemicals used in chemistry classes; the determination that certain items cannot be purchased due to budget restrictions; or certain portions of buildings cannot be used because of construction requirements). He may also have to deal with parents who are dissatisfied with transportation arrangements or building conditions or employees who are grieving personnel actions.

At Level d, contacts are made to justify or settle matters involving significant or controversial issues; e.g., recommendations affecting major programs, dealing with substantial expenditures, or significantly changing the nature and scope of organizations.

Level d is not met. The appellant does not have the authority to function as described at this level, therefore, his contacts do not involve the level of controversy or significance envisioned at Level d.

The combination of Persons Contacted at Level 3 and the Purpose of Contacts at Level c equates to 180 points, according to the matrix on page 25 of the guide.
Factor 8 - Physical Demands:

This factor measures the requirements and physical demands placed on the employee in performing the work assignment, including the agility and dexterity required, and the extent of physical exertion.

At Level 8-1, the work is primarily sedentary, although some slight physical effort may be required. At Level 8-2, assignments regularly involve long periods of standing, bending, and stooping to observe and study work operations in an industrial, storage, or comparable work area.

Level 8-1 is met. The appellant’s work involves limited physical effort typical of positions which function primarily in an office environment with some requirement for travel and observation of work operations in other locations. While these responsibilities may require a level of physical effort which exceeds that commonly referred to as sedentary, there is no indication in the appeal record that the appellant is subjected to prolonged standing, bending, stooping, or other types of physical exertion comparable to Level 8-2.

Level 8-1 is credited for this factor for 5 points.

Factor 9 - Work Environment:

This factor considers the risks and discomforts in the employee's physical surroundings, and the safety precautions required.

At Level 9-1, work is typically performed in an adequately lighted and climate controlled office, and may require occasional travel. At Level 9-2, assignments regularly require visits to manufacturing, storage, or other industrial areas, and involve moderate risks or discomforts which require the use of protective clothing and gear and the observance of safety precautions.

Level 9-1 is met. The appellant’s work is performed in a school and office environment which involves surroundings such as those described at Level 9-1. There is no evidence in the appeal record that the appellant is regularly exposed to work environments comparable to those described at Level 9-2, or that the use of protective gear and clothing is required to perform his assigned duties.

Level 9-1 is credited for this factor for 5 points.
A total of 2540 points falls within the range for a GS-11, 2355 to 2750 points, according to the Grade Conversion Table in the Administrative Analysis Grade Evaluation Guide.

**General Schedule Supervisory Guide:**

The General Schedule Supervisory Guide (GSSG) is used to determine the grade of General Schedule (GS or GM) supervisory positions in grades GS-5 through GS-15. The GSSG employs 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 descriptions for that factor and crediting the points designated for the highest factor-level which is fully 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 position is evaluated as follows:

**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. The agency credited Level 1-2. The appellant believes Level 1-3 is appropriate.
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 addressed under this element.

At Level 1-2, the program segment or work directed is administrative, technical, complex clerical, or comparable in nature, has limited geographic coverage, and supports 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 position directs a program segment that performs technical, administrative, protective, investigative, or professional work covering a major metropolitan area, a State, or a small region of several States; or, when most of an area's taxpayers or businesses are covered, comparable to a small city. Providing complex administrative or technical or professional services directly affecting a large or complex multimission military installation also falls at this level.

The appellant’s work is administrative and has limited geographic coverage. The [installation] dependents schools provide elementary and secondary education to the dependents of military personnel assigned to [installation] and [installation] which is about 14 miles away. [installations] covers approximately 179,000 square acres and is a large command with a population exceeding 35,000. The appellant provides administrative services in support of the dependents school system comprised of approximately 552 employees and 3700 students. Since the appellant’s work supports a program segment that impacts over 4000 personnel, it exceeds the small military base or typical field office setting characteristic of Level 1-2. However, the organizational breadth and complexity of the appellant’s work are otherwise clearly unlike the work examples given for Level 1-3.

Level 1-3 criteria are specific only to the geographic coverage of program scope. To determine whether other aspects of Level 1-3, such as organizational coverage, are also met, the appellant’s work must be further evaluated against the three illustrations on pages 11 and 12 of the guide. The first illustration pertains to managing substantive projects throughout a region, such as civil works projects engineering organizations might carry out. The second pertains to furnishing a significant portion of an agency’s line program directly to the general public. The third pertains to providing administrative services (personnel, supply management, budget, facilities management, or the like) to an organization or group of organizations like large or complex multimission military installations. Of the three, only the third is directly relevant to the appellant’s work because it alone describes a similar situation, i.e., providing support services to an organization. It indicates that Level 1-3 is met if the services support and directly affect the operations of a bureau, a major military command headquarters, a large or complex multimission military installation, or an organization or group of organizations of comparable complexity and size.
To determine the organizational equivalent serviced by the appellant’s position, the definition in the GSSG of a large complex multimission military installation must be examined. The GSSG describes a large complex multimission military installation as one which is comparable to one of the two following situations:

1. A large military installation or group of activities with a total serviced or supported employee-equivalent population exceeding 4000 personnel, and with a variety of serviced technical functions. These personnel are directly affected by, but not supervised 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; nonemployed personnel such as dependents are significant only if directly impacted by the program segment and work directed; or

2. A complex, multimission installation or a group of several organizations directly supported by the position under evaluation that includes four or more of the following: a garrison; a medical center or large hospital and medical laboratory complex; multimillion dollar (annual) construction, civil works, or environmental cleanup projects; a test and evaluation center or research laboratory of moderate size; an equipment or product development center; a service school; a major command higher than that in which the servicing position is located or a comparable tenant activity of moderate size; a supply or maintenance depot; or equivalent activities. These activities are individually smaller than the large installation described in the preceding paragraph.

While the employee-equivalent population supported and impacted by the appellant’s work exceeds the 4000 personnel regarded by the guide as the minimum complement of a large military installation, the program segment (i.e., the dependents school system) itself lacks the diversity and complexity of functions found in complex multimission installations. Consequently, even though the program segment directed by the appellant exceeds Level 1-2, it does not enjoy the full complexity and breadth typical of Level 1-3 programs or administrative services.

Level 1-2 is credited for Scope.

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.

At Level 1-3, the 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 (e.g., a segment of a regulated industry), or the general public. At the field activity level (i.e., large, complex multimission organizations or very large serviced
populations) the work directly involves or substantially impacts the provision of essential support services to numerous, varied, and complex technical, professional, or administrative functions.

The appellant’s work directly impacts the dependents school system alone and does not extend to a wide range of [installation] activities, nor does it substantially impact numerous, varied, and complex technical, professional, or administrative functions, such as those found at large or complex military installations (as explained earlier). Although other organizations on base may use the facilities at various times, the work performed by the appellant has no direct impact on these other programs. For example, if the school facilities were not available, other base facilities would be used instead. Consequently, Level 1-3 is not met and only Level 1-2 applies.

Level 1-2 is credited for Effect.

Both Scope and Effect equate to Level 1-2. Therefore, Factor 1 is credited with Level 1-2 for 350 points.

Factor 2, Organizational Setting:

This factor considers the organizational situation of the supervisory position in relation to higher levels of management. The agency credited Level 2-2 and the appellant does not contest that evaluation.

At Level 2-2, the position is accountable to a position that is one level below the first Senior Executive Service, flag or general officer, or equivalent or higher level position in the direct supervisory chain.

At Level 2-3, the position is accountable to a position that is Senior Executive Service (SES) level, or an equivalent military rank, or to a position which directs a substantial GS/GM-15 or equivalent workload. This is the highest level described for this factor.

The appellant reports to the Superintendent who is accountable to the Director, DDESS, who occupies an SES position. This meets Level 2-2.

This factor is credited with Level 2-2 for 250 points.

Factor 3, Supervisory and Managerial Authority Exercised:

This factor covers the delegated supervisory and managerial authorities that are exercised on a recurring basis. To be credited with a level under this factor, a position must carry out the authorities and responsibilities to the extent described for the specific level. Levels under this factor apply equally to the direction of specialized program management organizations, line functions, staff functions, and operating and support activities. The agency credited Level 3-3, and the appellant does not contest that evaluation.
Level 3-3 describes two situations, either of which meets the level. In the first situation, the position exercises delegated managerial authority to set a series of annual, multiyear, or similar long-range work plans and schedules for in-service or contracted work; assure implementation by subordinate organizational units of program goals and objectives; determine which goals and objectives need additional emphasis; determine the best solution to budget shortages; and plan for long-range staffing needs. Positions in this situation are closely involved with high level program officials or comparable agency staff personnel in developing overall goals and objectives for assigned functions or programs. The second situation covers second-level supervisory positions who perform the full range of supervisory functions described at Level 3-2, and at least half of the conditions described at Level 3-3, including such matters as using subordinates to direct or lead work, exercising significant advisory or coordinating responsibilities, assuring equity of performance standards and ratings among subordinate units, directing a program segment with significant resources, making decisions on matters elevated by subordinate supervisors, exercising personnel authority over subordinate supervisors and employees, approving serious disciplinary actions, making nonroutine decisions, and approving the expenditure of funds.

Level 3-4 also describes two situations, either of which meets the level. In the first situation, the position being evaluated exercises delegated authority to oversee the overall planning, direction, and timely execution of a program, several program segments managed through separate organizational units, or comparable staff functions. Such positions include responsibility for development, assignment, and higher level clearance of goals and objectives for subordinate organizations; approving multiyear and longer range work plans developed by subordinate supervisors; overseeing the revision of long-range plans, goals and objectives; managing the development of policy changes; managing organizational change; and exercising discretionary authority to distribute funds in the organization's budget. In the second situation, the supervisor exercises final authority for the full range of personnel actions and organization design proposals.

The appellant meets all of the requirements of Level 3-2c, as well as 9 of the 15 duties described in Level 3-3b (1, 2, 5, 6, 8, 9, 10, 11, and 14). This is equivalent to Level 3-3 in the guide. He does not have the program management or organizational authority described at Level 3-4. Therefore, Level 3-3 is appropriate.

Level 3-3 is credited for 775 points.

Factor 4, Personal Contacts:

This is a two-part factor which assesses the nature and the purpose of personal contacts related to supervisory and managerial responsibilities. The same contacts that serve as the basis for the level credited under Subfactor 4A must be used to determine the correct level under Subfactor 4B.

Subfactor 4A, Nature of Contacts
This subfactor covers the organizational relationships, authority or influence level, setting, and difficulty of preparation associated with making personal contacts involved in supervisory and managerial work. To be credited, the level of contacts must contribute to the successful performance of the work, be a recurring requirement, have a demonstrable impact on the difficulty and responsibility of the position, and require direct contact. The agency credited Level 4A-3, and the appellant does not contest that evaluation.

At Level 4A-3, recurring contacts are with high ranking military or civilian managers at bureau and major organizational levels within the agency, with agency administrative personnel, or with comparable personnel in other agencies; key staff of public interest groups with significant political influence or media coverage; journalists representing influential city or county news media; Congressional committee and subcommittee staff assistants; 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; or with State and local government managers. These contacts take place in meetings and conferences and often require extensive preparation.

At Level 4A-4, frequent contacts are with influential individuals or organized groups from outside the agency; regional or national officers of trade associations, public action groups, or national professional organizations; key staff of Congressional committees and principal assistants to Senators and Representatives; elected or appointed representatives of State and local governments; journalists of major metropolitan, regional, or national news media; or with SES, flag officer, or Executive Level heads of bureaus and higher level organizations in other Federal agencies. These contacts may take place in meetings, conferences, briefings, speeches, presentations, or oversight hearings, and may require extemporaneous response to unexpected or hostile questioning. Preparation for such contacts typically requires extensive analytical input by subordinates or involves the assistance of support staff.

The appellant’s contacts are comparable to Level 4A-3. He has regular and recurring contacts with DDESS Headquarters officials, union officials, School Board members, [installation] personnel, parents, students, and agency administrators and supervisors. These contacts take place in informal situations, as well as formal meetings, e.g., School Board meetings, parent conferences. He does not routinely have contact with the types of influential persons or groups such as Congressional committees, national professional organizations, national news media, etc., described at Level 4A-4.

This subfactor is credited with Level 4A-3 for 75 points.

Subfactor 4B, Purpose of Contacts

This subfactor covers the purpose of the personal contacts credited in Subfactor 4A, including the advisory, representational, negotiating, and commitment-making responsibilities related to supervision and management. The agency credited Level 4B-2. The appellant believes 4B-3 should have been credited.
At Level 4B-2, the purpose of contacts is to ensure that information provided to outside parties is accurate and consistent; to plan and coordinate the work directed with that of others outside the subordinate organization; or to resolve differences of opinion among managers, supervisors, employees, contractors, and others.

At Level 4B-3, the purpose of contacts is to justify, defend, or negotiate in representing the project, program segment, or organizational unit, 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 significance or importance to the program or program segment.

While any one of the three elements at Level 4B-2 merits credit for that level, the criteria for Level 4B-3 are more stringent. All three of the conditions stated must be met in order to credit Level 4B-3. This level requires justifying, defending, or negotiating on behalf of the organization with the necessary level of authority to commit resources and gain compliance with established policies of the organization. In order to represent the organization in program defense or negotiations, a supervisor must have the requisite control over resources and the authority necessary to gain support and compliance on policy matters.

The purpose of the appellant’s contacts is to make recommendations; improve services; obtain information; and provide authoritative assistance, guidance, advice, and resolutions to a broad range of matters. He directs the work of the maintenance and transportation programs; acts as a liaison with various parent, base, and union organizations; resolves problems with contractors; etc. He may persuade the principals at the schools to take certain actions to come into compliance with environmental regulations, however, they are generally cooperative. He may also justify reasons for wanting to take certain actions, e.g., justify to headquarters why [installation] needs new school buildings; justify to the superintendent why certain maintenance projects have a particular priority. He does not, however, have the final authority to commit resources or enforce compliance with program actions. That authority rests with the superintendent. Since the appellant does not have the ultimate authority to commit resources and enforce compliance, he does not meet all three conditions necessary to credit Level 4B-3, and 4B-2 must be credited.

This subfactor is credited at Level 4B-2 for 75 points.

**Factor 5, Difficulty of Typical Work Directed:**

This factor measures the difficulty and complexity of the basic work most typical of the organization(s) 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 agency credited Level 5-4, and the appellant does not contest that evaluation.
The appellant directly supervises 2 employees at grades GS-5 and GS-3, and indirectly supervises 34 maintenance personnel and school bus drivers. The agency determined that the wage grade positions constituting at least 25 percent of the workload equate to the GS-7 level, and we agree with that determination. According to the chart on page 24 of the guide, if the highest level of base work is GS-7 or 8, or the equivalent, the factor level assigned is 5-4.

Factor Level 5-4 is credited for 505 points.

Factor 6, Other Conditions:

This factor measures the extent to which various conditions contribute to the difficulty and complexity of carrying out supervisory duties, authorities, and responsibilities. To evaluate Factor 6, two steps are used. First, the highest level that a position substantially meets is initially credited. Then, if the level selected is either 6-1, 6-2, or 6-3, the Special Situations listed after the factor level definitions are considered. If a position meets three or more of the situations, then a single level is added to the level selected in Step 1. If the level selected under Step 1 is either 6-4, 6-5, or 6-6, the Special Situations may not be considered in determining whether a higher factor level is creditable. The agency credited Level 6-3, as well as Variety of Work and Physical Dispersion under Special Situations. The appellant believes Fluctuating Work Force or Constantly Changing Deadlines and Special Hazards and Safety Conditions should also be credited under Special Situations.

The GSSG describes two situations, either of which meets Level 6-3. The first situation involves 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 level where the supervisor has full and final technical authority (i.e., is responsible for all technical determinations arising from the work without technical advice or assistance from others or further review of the work). Directing work at this level requires consolidation or coordination to ensure consistency of product, service, interpretation, or advice; or conformance with the output of other units, with formal standards, or agency policy. This situation also covers direction of analytical, interpretive, judgmental, evaluative, or creative work where the supervisor must resolve conflicts and maintain compatibility of interpretation, judgment, logic, and policy application. The second situation covers positions which direct subordinate supervisors over positions in grades GS-7 or 8 or the equivalent, requiring consolidation or coordination to ensure consistency of product, service, interpretation, or advice; or conformance with the output of other units, with formal standards, or agency policy.

The appellant directs two subordinate supervisors over positions equivalent to grade GS-7. This meets the second situation described at Level 6-3.
SPECIAL SITUATIONS

1. *Variety of Work:*

Credit this situation when more than one kind of work, each kind representing a requirement for a distinctly different additional body of knowledge on the part of the supervisor, is present in the work of the unit. A “kind of work” usually will be the equivalent of a classification series. Each “kind of work” requires substantially full qualification in distinctly separate areas, or full knowledge and understanding of rules, regulations, procedures, and subject matter of a distinctly separate area of work. Additionally, to credit “Variety” (1) both technical and administrative responsibility must be exercised over the work, and (2) the grade level of the work cannot be more than one grade below the base level of work used in Factor 5. The agency credited this situation; however, we disagree.

The appellant is the second-level supervisor over positions in the following series: WG-4102, WG-4206, WG-5306, WG-4402, AD-4749, and AD-5703. He also directly supervises a GS-1105-5 and an AD-326-3. He is not a technical supervisor over the trade and maintenance mechanic positions (i.e., he is not required to be qualified in each of the trade positions), and the two positions he directly supervises are more than one grade level below the base level of work used in Factor 5 (GS-7). Therefore, this situation cannot be credited.

2. *Shift Operations:*

Credit this situation when the position supervises an operation carried out on at least two fully staffed shifts. The agency did not credit this situation, and we agree.

The appellant does not supervise any shift work, therefore, this situation cannot be credited.

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

Credit Fluctuating Work Force when the work force supervised by the position has large fluctuations in size (e.g., when there are significant seasonal variations in staff) and these fluctuations impose on the supervisor a substantially greater responsibility for training, adjusting assignments, or maintaining a smooth flow of work while absorbing and releasing employees. The agency did not credit this situation, and we agree.

The appellant’s work force does not fluctuate in size, therefore, this situation cannot be credited.

Credit Constantly Changing Deadlines when frequent, abrupt, and unexpected changes in work assignments, goals, and deadlines require the supervisor constantly
to adjust operations under the pressure of continuously changing and unpredictable conditions. The agency did not credit this situation, and we agree. The appellant believes he should receive credit.

The appellant contends that constant changes in curriculum needs, continuing changes in transportation needs, health and safety issues, and uncontrollable weather conditions require frequent and unexpected changes in work assignments. The nature of the appellant’s position requires him to make work assignments based on current facility needs, transportation needs, or health and safety issues as a routine part of his position. For example, the minor maintenance crew expects to respond to maintenance problems as they occur. Transportation schedules for the bus drivers are established for the regular school day; however, field trips or other occasions requiring the use of buses must be arranged with the transportation supervisor. These trips are normally planned in advance and seldom occur abruptly. The health and safety issues are handled through established procedures. There is no information in the record to support frequent, unexpected, or continuously changing conditions in the environment which threaten the safety of the personnel. There is also no information to support constantly changing weather conditions having a frequent and abrupt impact on the appellant’s position. This situation is not met and cannot be credited.

4. **Physical Dispersion:**

Credit this situation when a substantial portion of the workload for which the supervisor is responsible is regularly carried out at one or more locations which are physically removed from the main unit (as in different buildings, or widely dispersed locations in a large warehouse or factory building), under conditions which make day-to-day supervision difficult to administer. The agency credited this situation. We disagree.

The appellant is the second-level supervisor over the transportation and maintenance units. He makes visits to assess certain facility conditions, but he does not perform day-to-day supervision of the maintenance mechanics and trades employees. In addition, bus drivers, by their very nature, perform their work in many locations and are not subject to close day-to-day supervision. This situation is not met and cannot be credited.

5. **Special Staffing Situations:**

Credit this situation when: (1) a substantial portion of the work force is regularly involved in special employment programs; or in similar situations which require involvement with employee representatives to resolve difficult or complex human resources management issues and problems; (2) requirements or counseling and motivational activities are regular and recurring; and (3) job assignments, work
tasks, working conditions, and/or training must be tailored to fit the special circumstances. The agency did not credit this situation, and we agree.

There is no information in the record to indicate any special staffing situations associated with the appellant’s position. This situation is not met and cannot be credited.

6. **Impact of Specialized Programs:**

Credit this situation when supervisors are responsible for significant technical or administrative workload in grades above the level of work credited in Factor 5, provided the grades of this work are not based upon independence of action, freedom from supervision, or personal impact on the job. The agency did not credit this situation, and we agree.

The appellant is not responsible for any specialized workload as described here. This situation is not met and cannot be credited.

7. **Changing Technology:**

Credit this when work processes and procedures vary constantly because of the impact of changing technology, creating a requirement for extensive training and guidance of the subordinate staff. The agency did not credit this situation, and we agree.

There is no information in the record to indicate the appellant’s work is impacted by changing technology. This situation is not met and cannot be credited.

8. **Special Hazard and Safety Conditions:**

Credit this situation when the supervisory position is regularly made more difficult by the need to make provision for significant unsafe or hazardous conditions occurring during the performance of the work of the organization. The agency did not credit this situation, and we agree.

The appellant is the second level supervisor over the maintenance unit performing work at the various facilities housing 3700 students plus approximately 550 faculty and other personnel. Although maintenance activities and construction take place while the students and teachers are onsite, there are strict guidelines and safety regulations in place that maintenance mechanics are to follow. In addition, bus drivers observe laws and regulations designed to ensure the safe transport of students. In both instances, there is a supervisor over each unit with responsibility for ensuring safe performance of the work. Procedures are also established to handle environmental hazards (e.g., chemical waste from the chemistry labs, asbestos or lead paint in the school buildings where construction is taking place). The appellant’s supervisory duties are not regularly made more difficult by significant unsafe and hazardous conditions. This situation is not met and cannot be credited.
Since the appellant’s position does not meet any of the special situations, no additional level of credit is added for Factor 6.

Factor 6-3 is credited for 975 points.

<p>| SUMMARY |</p>
<table>
<thead>
<tr>
<th>FACTOR</th>
<th>LEVEL</th>
<th>POINTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Program Scope and Effect</td>
<td>1-2</td>
<td>350</td>
</tr>
<tr>
<td>2. Organizational Setting</td>
<td>2-2</td>
<td>250</td>
</tr>
<tr>
<td>3. Supervisory and Managerial Authority Exercised</td>
<td>3-3</td>
<td>775</td>
</tr>
<tr>
<td>4. Personal Contacts</td>
<td></td>
<td></td>
</tr>
<tr>
<td>A. Nature of Contacts</td>
<td>4A-3</td>
<td>75</td>
</tr>
<tr>
<td>B. Purpose of Contacts</td>
<td>4B-2</td>
<td>75</td>
</tr>
<tr>
<td>5. Difficulty of Typical Work Directed</td>
<td>5-4</td>
<td>505</td>
</tr>
<tr>
<td>6. Other Conditions</td>
<td>6-3</td>
<td>975</td>
</tr>
<tr>
<td>TOTAL</td>
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<td>3005</td>
</tr>
</tbody>
</table>

A total of 3005 points equates to a GS-12, 2755 to 3150 points, according to the point-to-grade conversion chart on page 31 of the GSSG.

**Summary**

Duties evaluated by use of the Administrative Analysis Grade Evaluation Guide equate to the GS-11 level, supervisory duties equate to the GS-12 level. The supervisory duties require more than 25 percent of the appellant’s time and are grade-controlling.

**Decision**

This position is properly classified as Administrative Officer, GS-341-12. This decision constitutes a classification certificate issued under the authority of section 5112(b) of title 5, United States Code. This certificate is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the Government.