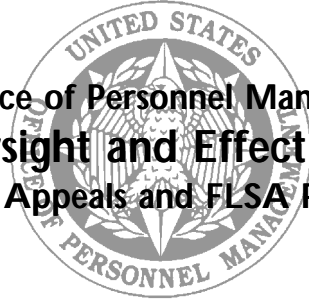


U.S. Office of Personnel Management
Office of Merit Systems Oversight and Effectiveness
Classification Appeals and FLSA Programs



Philadelphia Oversight Division
600 Arch Street, Room 3400
Philadelphia, PA 19106-1596

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

Appellant: [appellant's name]

Agency classification: Historian
GS-170-11

Organization: Branch of Cultural Resource Management
Division of Interpretation and
Cultural Resource Management
[name] National Historical Park
National Park Service
U.S. Department of the Interior
[location]

OPM decision: Historian
GS-170-11

OPM decision number: C-0170-11-01

Robert D. Hendler
Classification Appeals Officer

 /s/ 12/3/99

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 (PCS's), appendix 4, section G (address provided in appendix 4, section H).

Decision sent to:

[appellant's name]
[appellant's address]

Assistant Regional Director,
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Northeast Region
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Introduction

On August 16, 1999, the Philadelphia Oversight Division of the U.S. Office of Personnel Management (OPM) received a classification appeal from [appellant's name]. His position (Position Description (PD) #4860-66) currently is classified as Historian, GS-170-11. However, he believes the classification should be Historian, GS-170-13. He works in the Branch of Cultural Resource Management, Division of Interpretation and Cultural Resources Management, [name][acronym], National Park Service (NPS), U.S. Department of the Interior, [location]. We have accepted and decided his appeal under section 5112 of title 5, United States Code (U.S.C.).

General issues

The appellant believes that his position compares favorably with the GS-13 grade level as described in the History, GS-170 PCS. He claims that unlike a one- or two-day Civil War battle described as typical of GS-11 grade level work, the [name] Encampment lasted six months, and that an excellent understanding of the first two-and-one-half years of the Revolutionary War is required to study it. The growth of [name] into the third largest city, as the center of a network of magazines, auxiliary posts, and supply depots in Pennsylvania, New Jersey, Maryland and Delaware, requires the study of the social, economic, agricultural, politics, and religious aspects of eighteenth century life. The appellant described the history of the [name] area, both before and after the Revolutionary War, stating that "the [name] story is complex and multi-faceted with multiple major themes and time periods represented."

In his appeal rationale, the appellant referenced internal NPS documents to establish the relative significance of [acronym] and support his claim that it includes the multiplicity of themes warranted for evaluating his position at the GS-13 grade level. He cited the NPS "Thematic Framework" that was developed in 1996, listing a total of "eight major Historic Context Themes." He also cited draft reports for four component landscapes in the park "in which six of the eight Historic Context Themes and nine of the Subthemes listed in the 'Thematic Framework' were identified" covering 1750 to the present. He compared the wording in his PD of record with the GS-13 grade level criteria in the GS-170 PCS to support his claim.

The appellant also states that his position should be considered as a "mixed series" because he is accountable for "all aspects of management of the [name] Library." He claims that he spends approximately 20 percent of his time working in the Librarian, GS-1410 series since he is responsible for acquisitions, cataloging and classification, shelving, deaccessioning, preservation, and conservation. The appellant states that he: (1) locates both published and unpublished information from a wide variety of sources and data bases that requires considerable knowledge in the various subject matter areas; (2) makes recommendations for collections development; and (3) provides for the specialized information needs of library users. He claims that he has developed: (1) several variations in the Library of Congress classification system to more readily locate material; (2) a new classification system for computer cataloging of the vertical files consisting of "thousands of articles and papers on the Revolutionary War, biography and other topics" that will act as a finding aid for researchers; and (3) a variety of computerized tools to

help researchers. He cited an internal NPS memorandum describing it as a “library of extraordinary importance to academic and independent scholars. . . .”

The appellant took issue with management’s decision to have him report to a branch chief rather than a division chief, stating that he believed the change was “to lessen the importance of my position, after I appealed my position classification to the Department of the Interior.” Citing an October 26, 1998, memorandum to the Deputy Superintendent, [name] National Historic Park concerning an NPS review of the proposed upgrading of his position, he claimed that an internal NPS “survey of other National Park Service [Historian, GS-170] GS-11 positions,” and an analysis of their respective grade supporting elements, “was not proper and a violation of 5 U.S.C.” The appellant further noted the agency evaluation report of his position failed to recognize that he performs librarian work that “demands an additional level of knowledge and expertise.” He believes that a comprehensive review and an impartial comparison with OPM PCS’s and guidelines “will result in my PD being upgraded to the GS-13 level.”

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). 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** is the duties and responsibilities which make up the work performed by an employee. Title 5, U.S.C. 5106 prescribes the duties, responsibilities and qualifications required by those duties and responsibilities as the basis for determining the classification of a position. The Introduction to the Position Classification Standards (Introduction) further provides that “As a rule, a position is classified on the basis of the duties actually performed.” Additionally, 5 CFR 511.607(a)(1), in discussing PD accuracy issues, provides that OPM will decide classification appeals on the basis of the actual duties and responsibilities assigned by management **and** performed by the employee. The point here is that it is a real operating position that is classified, and not simply the PD. Therefore, this decision must be based on the actual work assigned to and performed by the appellant, not merely a review of his PD of record.

The classification appeal process is a de novo review that includes a determination as to the duties and responsibilities assigned to the appellant’s position and performed by the appellant, and constitutes the proper application of PCS’s to those duties and responsibilities. Therefore, the appellant’s perceptions regarding the fact finding and other methods used by his employing agency in reaching its decision on the classification of the position are moot.

The appellant and his supervisor agree the appellant’s PD of record is accurate. Our on-site audit and interview with his immediate supervisor, [name], on September 30, 1999, confirmed that the PD contains the major duties and responsibilities assigned by management and performed by the appellant and is hereby incorporated by reference into this decision. Based on the following analysis, however, we find that it overstates the difficulty and complexity of the work assigned to and performed by the appellant.

Position information

The PD of record states that the position is responsible for professional research support to the [acronym] resource preservation, public information, and interpretive functions, and manages the VFNH park library. Major functions include: (1) planning and carrying out a series of definitive historical studies relating to the multiple major themes of [name] including “the Revolutionary War, the Philadelphia Campaign, the [name] encampment, 19th century industrial, agricultural and commercial development, and over 120 years of site preservation activities. Studies cover fields such as military, agricultural, diplomatic, social, political, and industrial aspects over more than 250 years”; (2) identifying research project and preservation needs, planning and carrying them out; (3) preparing and presenting papers and recommendations on all aspects of the history of [name] and related events to staff through written briefs, research reports, and workshops; (4) preparing and giving talks of a specialized nature; (5) preparing special history studies, cultural landscape reports, historic structure reports, directing personnel engaged in historical research when working in a team; and (6) locating and providing research material for the preparation of exhibits, publications, and audiovisual programs. Other duties entail: (1) reviewing publications, scripts, and other non-personal media material prepared by others for historical accuracy and thoroughness; (2) seeking new primary and secondary material, both published and archival; (3) participating in [acronym] planning activities with emphasis on those involving history and cultural resources; (4) initiating funding and planning requests for program needs; (5) responding to inquiries of scholars on historical research subjects, study methods, and procedures; and (6) synthesizing information from other disciplines, e.g., archeology and historical architecture, to support structure preservation.

The PD of record states that the library contains approximately 32,000 items. The collection consists of “over 6,000 catalogued books, 1,200 microform items, 14,000 journal and professional items, and copies of 12,000 original documents.” The work includes coordinating the performance of library work by volunteers and interns, and assisting staff, visitors, the public, and professional researchers and academics.

Series, title, and guide determination

The agency has placed the position in the History Series, GS-170, and titled it Historian in conformance with titling practices of the GS-170 PCS. The appellant agrees with the series and title determination made by the agency, and we concur. The position is allocated properly as Historian, GS-170, for which there is a directly applicable published PCS.

The record shows that the Horace Wilcox Library collection is preponderantly housed in a single room and adjoining areas in the [name] House. The room has two large reading tables, and also houses the appellant’s desk and computer terminal. Unpublished primary sources occupy approximately four file drawers. The bulk of the collection consists of published and microform copies of primary source materials, e.g., the papers of George Washington, and monographs on Colonial and Early American history. In 1998, 117 printed volumes were added to the

collection, as were a variety of periodicals. Deaccessioning primarily consists of eliminating duplicates of books and those that are of little importance to the primary purpose of the collection, e.g., Revolutionary War research. Most books are supplied with complete Library of Congress catalog cards, although the appellant may modify or change a filing category based on the overall structure of the current collection.

The appellant stressed the importance of the library, citing an April 2, 1990, memorandum from the Chief, Office of Library, Archives and Graphics Research, Harpers Ferry Center (HFC) that states:

You should be aware that the VAFO [[name]] library is probably one of the ten largest and best organized park libraries in the system (that doesn't include HFC or any of the other center or regional library). It is also one of the classiest reading rooms in the system. Because of that, and because it is a research library that has become known to the world of Revolutionary War researchers, it deserves all the attention it can get from management.

While the library is open for public use, the bulk of the appellant's collection and related determinations are integral to the historian functions of his position. For example, copies of letters he provided in support of the appeal indicate the search for additional primary source information, primarily in the form of letters and diaries, is intended for [acronym] cultural resources program use. Therefore, this work is addressed properly in our application of GS-170 PCS to the appellant's position.

The [name] Library is not listed as having a significant special collection in the Directory of Special Libraries and Information Center, 23rd Edition, 1999, Faerber and Miskelly, eds. The library also is not listed under U.S.-History-Revolution in Subject Collections, 7th Edition, 1993, Ash and Miller, eds. In contrast, the Independence National Historic Park Library is listed in Ash and Miller, which shows 18,500 volumes, 150,000 research note cards, 15,000 slides, 18,000 pictures, 1,200 photostats, 610 reels of microfilm, and 1,000 pamphlets. Therefore, while internal NPS staff may view the [name] Library as a valuable internal resource, it must be considered a small collection within the meaning of the Librarian Series, GS-1410 PCS.

The appellant's limited accessioning, cataloguing and related library administration activities do not require the application of professional library science knowledge and skill. These functions are covered by the Library Technician Series, GS-1411, which includes performing library materials acquisition, copy cataloguing and similar work based on a practical knowledge of library or related information services, tools, methods, and procedures. The GS-1411 PCS recognizes that large regional, national, and international bibliographic utilities, available on-line or through electronic storage systems, permit library technicians to catalog most routine types of material by copying the record and modifying it to conform to local bibliographic practices. The highest knowledge level described in the GS-1411 PCS includes knowledge and use of specialized technical methods and procedures, including: (1) bibliographic data elements and cataloging rules

to perform limited original descriptive, or preliminary, cataloging of monographic-type materials; and (2) knowledge of manual and automated reference tools including external data bases and the library's collections to provide ready reference services to scientists and engineers. We find the appellant applies similar knowledge and skill in managing the library collection, and providing reference assistance in correspondence and to library visitors.

We will not address the appellant's GS-1411 functions in greater detail for two reasons. As stated in the Introduction to the PCS's, duties and responsibilities occupying less than 25 percent of the work time of a position may not control the grade level of a position. Because these technician duties would not exceed the GS-7 grade level, they are evaluable at a lower grade level than the appellant's GS-170 work as discussed below.

Grade determination

The GS-170 PCS uses two classification factors for grade determination: *Nature of the Assignment* and *Degree of Responsibility*. They serve to provide both the framework within which the occupation is structured and specifically applicable criteria for the evaluation of levels of work.

Nature of the Assignment

This factor includes the scope and complexity of the assignment, the knowledges and skills that must be used, project and the skills and knowledges required to complete the assignment.

We find the appellant's assigned work compares closely with the GS-11 grade level. At that level, assignments usually involve one or more major topics or themes of history and require consideration and treatment of several related topics in order to place the study in its proper context. Illustrative of this type of assignment is (1) study of a military exercise including the planning and organizational phases, the operational and logistical problems involved, their causes and solutions; and (2) a study of United States policy regarding trade relationships with another country during a specified time period, taking into account the economic, military and political considerations which influenced policy decisions. Another typical assignment involves planning and carrying out a series of historical research projects for a national historical park which centers around a single major historical theme and time period, e.g., a major Civil War battle, but which requires a variety of definitive special studies to establish boundaries, determine location of events, and provide historical data for use in the reconstruction or restoration of the area.

Assignments typically involve problems of the type and complexity described at the preceding level in several or all phases of their accomplishment. GS-11 historians are expected to exercise a good understanding of the purposes of the project and to consider such matters as the accessibility of source material and the time or other limitations involved in independently planning the details of project accomplishment. In resolving the problems presented by the assignment, GS-11 historians must employ (1) a good knowledge of available research sources,

(2) a good grasp of the primary subject matter involved and of related subject-matter fields (in order to achieve complete coverage of significant sources), (3) sound critical judgment in the evaluation of sources and the establishment of historical "fact," and in the development of hypotheses to account for causal relationships, and (4) substantial skill in organizing and writing a narrative that sets forth a balanced and realistic picture of the subject under consideration.

The GS-170 description of a single historical theme, e.g., a major battle, does not mean evaluating the events of a "day or two" as proposed by the appellant. GS-11 grade level analysis of such seminal events assumes a full analysis of such matters as: (1) the circumstances leading to the event, e.g., why it occurred when it did within the unfolding of the war; (2) what impact it had on or reflected in the overall history of the war, e.g., military technology or strategy; and (3) what impact it had on the overall conduct of the war, e.g., political or cultural. This requires the historian to have a good knowledge of the instant historical period, and previous periods that relate to the site.

Although [name] was not the site of a major battle, the encampment was an equivalent historical event within the meaning of the GS-170 PCS. For example, study of the encampment is critical to understanding the evolution of the Continental Army into an effective fighting force. The appellant's study of issues at the encampment, e.g., distinguishing between: (1) Victorian myth and historical reality of encampment weather conditions; (2) written orders defining encampment hut design from historical facts of actual structures; and (3) Native American oral history from historical facts on their part in the encampment, compare favorably with the breadth and depth of historical investigations found at the GS-11 grade level. Gaps exist in history, requiring careful reconstruction of events from primary and other sources. The appellant's transcription of several diaries, e.g., Lt. Samuel Armstrong and Thomas Sullivan, do not, in and of themselves, reflect a particular grade level worth. It is the analysis of diary content in his introductory narrative and footnotes, placing diary content into appropriate historical context by reference to primary and secondary sources, that reflect the investigation of GS-11 grade level equivalent issues; i.e., establishing historical fact based on a good knowledge of available research sources, applying sound judgment in establishing historical fact and causal relationships, and writing a balanced and realistic narrative of the subject. The appellant's continued search for useful primary source documents is integral to these efforts. Other potential areas of exploration, e.g., the appellant's investigation of the evolution of the [acronym] as part of 19th century memorialization, establishment as a state park, and subsequent conversion into a national park reflect the scope and complexity of research assignment envisioned at the GS-11 grade level; i.e., as areas of exploration developing from the precipitating encampment event.

The other [acronym] events researched by the appellant, while they add to knowledge of the site, are not major themes within the meaning of the GS-170 PCS. For example, placing the encampment site in context presumes an understanding of 18th century history, including the significance of [name] as an agricultural, mining, commercial and manufacturing site. The encampment, the events leading up to the encampment, and its subsequent memorialization form the single major "historical theme" as defined in the GS-170 PCS. The NPS-developed listing

of themes and subthemes for internal interpretive program and related purposes may not be construed as defining those terms in applying the GS-170 PCS. This could lead to the erroneous conclusion that major sites, inhabited through multiple periods of history, would qualify as covering multiple historical themes, contrary to the clear intent of the PCS. The appellant's providing of genealogical search assistance warrants evaluation at a lower grade level. However, this and related assistance he provides researchers and other members of the public are based on the breadth and depth of historical knowledge that he has developed as part of his ongoing program responsibilities that occupy a sufficient portion of his work time to control the evaluation of this factor.

The appellant claims that his work meets the GS-13 grade level. It is an established classification principle that a position must substantially exceed the GS-12 grade level before the GS-13 grade level may be considered. GS-12 assignments are distinguished from those at preceding levels by their broader scope, relatively greater depth of treatment, more varied subject matter, greater need for sound critical judgment, and the increasing number of considerations which must be taken into account. The GS-170 PCS illustrates a park-related situation as: (1) planning and carrying out a series of historical research projects for the purposes described at the GS-11 grade level, for a national historical park which centers around two or more major historical themes and represents more than one time period, e.g., the area may have been the scene of important military engagements in both the Revolutionary and Civil Wars, as well as the scene of one or more other nationally significant events in the political, economic, or cultural history of the United States; or (2) within a specified geographical area, usually a number of States, planning and carrying out a series of definitive studies of historic sites, representing a broad range of historic events and time periods in the political, military, economic, and cultural developments of the United States to make recommendations regarding the inclusion of sites in the park system or the designation of sites as national historic landmarks.

Illustrative of the first example would be conducting a series of major historical studies on the Yorktown, VA peninsula, site of major Revolutionary and Civil War battles, and the first successful colonial settlement, Jamestown. The significance of the area is amplified by the proximity of the colonial capital of Williamsburg, a major site in the intellectual debate that ultimately led to the Revolution. Further studies on structures within [acronym] for potential landmark status falls substantially short of conducting a series of studies throughout a major geographic area to develop major program proposals for creating new parks or designating sites as national historic landmarks. Based on the mission and functions of the NPS, these functions typically would reside in regional or higher level organizations, not in individual developed parks as proposed by the appellant.

At the GS-12 grade level, assignments present substantial planning problems. The magnitude of some assignments requires the historian to "segment" the research, either for accomplishment as a team effort, or to reduce the assignment to component parts of manageable proportions. This requires the historian to employ a good knowledge of the subject-matter fields involved and potential sources of historical evidence, to anticipate the major difficulties to be overcome and to

develop tentative approaches to the solution of those difficulties as a part of the planning process. In those cases where the project is to be accomplished by team effort, planning is further complicated by the necessity to define precisely the scope and purpose of each segment in order to preserve the emphasis and perspective demanded of the whole. Historians engaged in studies connected with the identification, recognition, preservation, restoration, reconstruction or interpretation of historic sites of importance to the national historical heritage must be fully familiar with both the purposes to be served by their work and the place of their recommendations in the context of the nationwide program.

We find that the appellant's studies do not entail the team efforts of segmentation typical of the GS-12 grade level. For example, such studies might include the: (1) analysis of several potential major historical sites to determine the potential boundaries of a proposed historic park, or (2) a series of studies on the importance of the Yorktown peninsula in American history. The appellant's discrete studies on events related to the encampment and related topics fail to meet the scope and complexity of segmented studies envisioned at the GS-12 grade level. The significance of [acronym] to the nation's history reflects aspects of studies connected with the identification, recognition, preservation, restoration, reconstruction or interpretation of historic sites of importance to the national historical heritage discussed at the GS-12 grade level. However, the scope and complexity of GS-12 grade level studies, as discussed previously, are not present in the appealed position. Furthermore, the limited scope of the appellant's most complex studies and the issues of Colonial and related history with which they deal does not have the impact on nationwide programs envisioned at the GS-12 grade level in the GS-170 PCS.

In addition to problems of the type described at lower levels in research, evaluation of evidence and establishment of historical fact, GS-12 assignments present substantial difficulties in the analysis of the facts developed. The assignments require the historian to: (1) evolve and test hypotheses, (2) clarify causal relationships, and (3) develop a reasonable, well balanced, and factually accurate synthesis. Problems in presentation arise out of the necessity to present, either in narrative form, through the medium of selected official documents, or in other appropriate form an objective and complete picture of the subject under consideration which clearly establishes the relative values and importance of the historical facts involved. As discussed previously, the appellant's most complex assignments reflect the analytical demands typical of the GS-11 grade level. Because of the limited scope of these studies, they do not result in the development of significant hypotheses, or the synthesis of facts extending knowledge of the field envisioned at the GS-12 grade level; i.e., hypotheses that deal with the broad and complex issues from the multiple historical themes studied at the GS-12 grade level. Rather, they primarily reflect dealing with gaps in and the reliability of evidence typical of the GS-11 grade level, e.g., separating myth from fact as to the weather conditions during the encampment, and the role of Native Americans at the encampment. For these and reasons discussed previously, we conclude that the appellant's [acronym] functions fall short of the scope and scale of assignments found at the GS-12 grade level. Accordingly, this factor is evaluated at the GS-11 grade level.

Degree of Responsibility

This factor includes the nature and purpose of person-to-person work relationships, and supervision received in terms of intensity of review of work as well as guidance received during the course of the work cycle.

GS-11 historians typically function with professional independence within limitations imposed by the scope and objectives of the assignment, which are clearly defined by the supervisor or a historian of higher grade, or established by specific directives from higher echelons. The historian is responsible for: (1) developing working plans and blocking out the major areas of research for the accomplishment of the assignment, (2) determining the approaches and techniques to be employed, and (3) modifying working plans and approaches as necessary in the course of the study. Typically, only modifications to working plans which would have the effect of changing the scope or coverage of the assignment are discussed with the superior prior to implementation.

Supervisory historians or other historians of higher grade may, or may not, be available for consultation as the work progresses, though arrangements for such consultation are possible if significant problems are encountered. Completed work typically is reviewed for completeness of coverage, soundness of conclusions, adequacy of presentation and conformance to professional standards and agency policy, rather than for the adequacy of the research or the methodology employed. Historians engaged in research programs for national historical parks are responsible for making recommendations as to the historic significance of the sites involved, and the desirability or feasibility of land acquisition or building restoration or reconstruction projects. Such recommendations are carefully reviewed at higher organizational echelons, both for their soundness in light of the supporting historical evidence and in light of overall program considerations.

In contrast, GS-12 grade level assignments are usually expressed in terms of the subject areas to be covered or the objectives to be served by the study. Within this framework, and the availability of time, the historian is allowed considerable latitude in setting the perimeters of the assignments. They are responsible for developing and modifying working plans as necessary to meet the objectives of their assignments. The nature of the review of their completed work is essentially the same as that described at the GS-11 level. Some historians at this and succeeding levels may be called upon for critical review and evaluation of the work of professional colleagues. Typically, this review relates to the methodology, all aspects of the subject matter of the work and the effectiveness of presentation, and includes responsibility for exercising skill and judgment in offering criticisms and suggestions for improvements. Recommendations made by GS-12 historians engaged in studies of historic sites, or studies for the development of national historical parks, are accepted as sound in light of the available historical evidence, but are reviewed in the context of nationwide program considerations.

The appellant stresses his independence from supervision. While studies typically have been self-defined by the appellant, our fact finding revealed that management has requested inquires into and development of several areas of interest. These include developing oral histories from people born in and/or raised in buildings currently on [acronym] land for use in future studies of the internal history of the park, commenting on cultural landscapes inventories conducted by

contractors, and developing project proposals. The review process for cultural landscape and related projects reflects the type of program control found at the GS-11 grade level. The subject areas for exploration at the GS-12 grade level are those previously discussed; e.g., studies covering two or more major historical themes and other nationally significant events in a national historical park. Because the program assigned to the appellant does not reflect the breadth of study areas and the scope of projects developed for this type of analysis, the appellant's position is precluded from being credited with the responsibility for planning and conducting those types of studies with the freedom from supervision envisioned at the GS-12 grade level. The limitations on the appellant's historic site analysis assignments discussed previously also preclude crediting the appealed position with the program planning and interpretive responsibilities intended for such assignments at the GS-12 grade level.

In addition to personal work contacts at preceding levels, GS-11 historians establish and maintain continuing consultative relationships with fellow historians and others both within and outside the Federal Government, including individuals in such related professional fields as architecture, archeology, political science, and economics. These contacts are for the purpose of maintaining current information regarding other historical work being done in their area of interest or for consultation or collaboration with subject-matter specialists in other professional disciplines. GS-12 historians engaged in special historical studies for use by management officials are required to establish and maintain continuing working relationships with such officials in order that they may keep abreast of current policy, planning and operational problems, and make known to such officials the background resources available to them through the medium of historical research studies.

The appellant stresses his standing as the recognized expert on the history and cultural resources of [name], citing correspondence from several published authors. The appellant claims that these contacts meet the GS-13 grade level because of his standing as an expert, consulted by published historians. Contacts at the GS-13 grade level relate to providing expert guidance on assignments typical of the GS-13 grade level, e.g., conducting a series of studies relating to historic sites throughout a major geographic area to provide historical judgments of a high order as to which sites are of national historical significance and eligible for National Historic Landmark status for inclusion, or proposed inclusion within the National Park System, or a series of equally complex studies for the near-term and long-range development of a national historical park of outstanding historical significance. As discussed previously, the appellant's assignments are not of this scope. While [acronym] is of historical significance, it falls short of the scope and complexity envisioned at the GS-12 grade level and, therefore, does not approach or meet the historical significance of the GS-13 grade level.

The appellant's contacts are typical of the GS-11 grade level; i.e., consultative contacts with historians both within and outside the Federal government. As at the GS-11 grade level, the appellant works with professionals in related fields, e.g., historical architects, consulting with them on cultural resource issues affecting [acronym] and the appellant's historical studies. Since the appellant is not engaged in the scope and complexity of historical studies found at either the

GS-12 or GS-13 grade levels as defined in the GS-170 PCS, his position may not be credited at these grade levels for this factor element. Accordingly, this factor is evaluated at the GS-11 grade level.

Summary

Since the appellant's position is evaluated properly at the GS-11 grade level with respect to both classification factors, it must be evaluated at the GS-11 grade level overall.

Decision

The appellant's position is correctly classified as Historian, GS-170-11.