

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

**Chicago Oversight Division
230 South Dearborn Street, DPN 30-6
Chicago, Illinois 60604**

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

Appellant: [Name]

Agency Classification: Housing Management Specialist
GS-1173-9

Organization: U.S. Department of Housing and Urban
Development
[Name] Office
[Name] Center
[City, State]

OPM decision: **Housing Management Specialist
GS-1173-9**

OPM decision number: C-1173-09-01

/s/
Frederick J. Boland
Classification Appeals Officer

April 11, 2000

Date

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

Decision sent to:

[appellant's name and address]

Ms. Barbara J. Edwards
Director, Office of Human Resources
U.S. Department of Housing and Urban
Development
451 Seventh Street, SW
Washington, DC 20410

Mr. Frederick C. Kuehn
Director, Human Resources Division
ASC-1
U.S. Department of Housing and Urban
Development
26 Federal Plaza, Room 35-130
New York, NY 10278

Introduction

The appellant is assigned to position number C33292, classified as Housing Management Specialist, GS-1173-9, on August 11, 1998. The position is located in the [Name] Center at the [Name] Office, U.S. Department of Housing and Urban Development (HUD), [City, State]. The appellant agrees that his position description accurately reflects his major duties, but believes his work warrants more credit than the agency allowed under Factor 2 (Supervisory Controls) of the classification standard.

Position Information

The appellant is one of two Housing Management Specialists in the [Name] Center. He reports to a GS-13 Supervisory Project Manager. There are approximately 40 employees in the Center, including 5 GS-13/14 Senior and Supervisory Project Managers, 22 Project Managers (2 at GS-13, 17 at GS-12, 2 at GS-11, and 1 at GS-9), a GS-13 Senior Multifamily Housing Representative, 3 GS-12 Construction Analysts, 2 GS-12 Appraisers, 2 GS-11 Funding Specialists, 1 GS-11 Housing Management Specialist, and 4 GS-7 Housing Program Assistants. The [Name] Center underwrites and services HUD-insured multifamily loans and grant programs. It monitors the financial and physical stability of insured and non-insured properties and management entities and ensures that the 700 some properties in its 35 county jurisdiction remain decent, safe, and sanitary dwellings.

Most of the appellant's time is devoted to answering written or verbal questions from HUD staff, owners and management agents of subsidized housing, and residents of low-income housing or their congressional representatives concerning occupancy of and admission into assisted housing. He provides technical advice and assistance to onsite housing managers and local housing authorities regarding income limits, rent levels and adjustments, re-certification, and continued occupancy. He advises Asset Management Branch staff and other HUD staff on occupancy issues concerning HUD-assisted projects. He develops administrative procedures and standards to guide local housing authorities in establishing and maintaining uniformity in project operations and management actions, specifically assisting program participants in developing resident selection criteria and plans that reflect the priorities of both HUD and the private owner.

He also conducts periodic housing surveys, management studies, and project audits. He evaluates the efficiency of housing programs, notes program trends, and prepares procedures and instructions for use in the onsite operations of housing projects. He conducts occupancy reviews, reviews applications for resident eligibility, and reviews vouchers for payments to owners and agents. He identifies managing agents' failure to accurately and correctly process rental assistance and confers with Asset Managers to resolve.

Analysis and Findings

Series and Title Determination

The Housing Management, GS-1173, series covers positions, like the appellant's, that assist in managing family housing projects, evaluating housing programs, developing housing

administrative procedures, or advising onsite housing management. Positions in this series require knowledge of housing management and administration as well as practical skills in housing related activities such as operations and maintenance, procurement of services, cost management and financial planning, assignments and utilization, occupancy changes and periodic inspections, scheduled and special requirement surveys, new construction and improvements, control of furnishings and equipment, master planning, and management-tenant relations.

The prescribed title for non-supervisory positions in this series at grades GS-9 and above is *Housing Management Specialist*.

Grade Determination

The U.S. Office of Personnel Management *Housing Management Series, GS-1173*, standard dated September 1981, is in Factor Evaluation System (FES) format. This system requires that credit levels assigned under each factor relate to only one set of duties and responsibilities. Under FES, work must be fully equivalent to the factor-level described in the standard to warrant credit at that level's point value. If work is not fully equivalent to the overall intent of a particular level described in the standard, a lower level and point value must be assigned, unless the deficiency is balanced by an equally important aspect of the work that meets a higher level.

Work demanding less than a substantial (at least 25 percent) amount of time is not considered in classifying a position. Similarly, acting, temporary, and other responsibilities that are not regular and continuing are not considered in classifying positions. (Temporary assignments of sufficient duration, though, are sometimes recognized in accordance with agency discretion by temporary promotion if higher graded duties are involved, by formal detail, or by performance awards.)

The appellant raises specific issues regarding one of the nine factors discussed in the standard. We independently reviewed his duties and responsibilities against the other factors and concur with the agency's credit level assignments on the undisputed factors. Accordingly, this decision details our analysis of the disputed factor.

Factor 2: Supervisory Controls

This factor covers the nature and extent of direct and indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work. Controls are exercised by the supervisor in the way assignments are made, instructions are given to the employee, priorities and deadlines are set, and objectives and boundaries are defined. Responsibility of the employee depends upon the extent to which the employee is expected to develop the sequence and timing of various aspects of the work, to modify or recommend modification of instructions, and to participate in establishing priorities and defining objectives. The degree of review of completed work depends upon the nature and extent of the review, e.g., close and detailed review of each phase of the assignment; detailed review of the finished assignment; spot-check of finished work for accuracy; or review only for adherence to policy.

The appellant states:

- (1) Supervisory Direction: I have the knowledge required to accomplish my work without supervisory

guidance pertaining to my specific tasks (duties)...I have been in [Name] Housing since I began work for HUD in June of 1990. I have been a Housing Management Specialist for 5 years. Most of my work is assigned independent of supervisory input. I am utilized as the occupancy expert in my office; staff address questions and letters to me. My immediate supervisor and her boss do not have the occupancy knowledge that I have. The supervisor and her boss do provide administrative directions with assignments in terms of broadly defined missions or functions, and yet the laws which govern my work can be researched and understood without input from a supervisor.

(2) Employee Responsibility/Independence: I independently research and make determinations to complete my HUD tasks which are guided by HUD handbooks and regulations and the type of questions I receive whether verbal or written. Ninety percent (90%) of my work is responding to written or verbal questions from HUD staff, owners/management agents of subsidized housing, residents of low-income housing, and congressional offices. I can conduct Occupancy Reviews and Conferences without any supervision at all. I have trained others regarding some specific occupancy duties, such as Special Claims (vacancies, unpaid rent, & damages), Occupancy Reviews, and Occupancy Conferences. Although much of the Occupancy Review process can be done within the HUD Field Office because much data that is at the projects is now within HUD's computer systems, I am still very capable of reviewing on-site (project/apartment, metropolitan housing authority, owner/agent) documents when necessary.

(3) Results of Work/Supervisory Review: My correspondence (letters) are normally accepted without significant change, and are considered as technically authoritative. Since I know my housing management specialist (occupancy) field, as an expert, supervisory changes to my letters are not substantial, and are normally due to phrasing which is typically used by our Field Office and Department. My correspondence is technically authoritative since we are building and contributing to an official government record each time we respond to inquiries from the public and the housing industry (owners, agents, housing agencies, etc.). Much of my work is supported by research of laws and regulations.

At Level 2-3, the appellant is already credited with much of what he seeks. He has credit for independently planning and carrying out numerous, but conventional, housing assignments and for resolving recurring housing management problems. Under Factor 3, at Level 3-3, he also has credit for independently interpreting and adapting agency policy and directives for application to the difficult but well precedented occupancy problems that he encounters. He has credit for applying good judgment to these problems in accordance with guidelines and his previous experience and training.

While the appellant works independently on difficult but common problems that experienced Level 2-3 Specialists handle without help, he lacks responsibility for the fuller range of housing activities expected at Level 2-4. For example, he lacks significant responsibility for housing operations and maintenance, cost management and financial planning, assignments and use, new construction and improvements, referral services, and furnishings management. Consequently, he does not encounter the variety of routine and unusually difficult problems the broader range of housing activities presents. Since Factor 2 assesses responsibility as well as independence, his credit under this factor is limited by the position's responsibilities.

In response to our request for specific work examples reflecting the extent of his responsibility and the difficulties he encounters, the appellant cited such examples as:

- Participation in a special review of the [City] Metropolitan Housing Authority.
- Review of the [State] Housing Finance Agency which resulted in findings of TRACS

(Tenant Rental Assistance Certification System) violations.

- Review of leases and tenant application procedures for new properties.
- Research of client/tenant concerns such as medical expense allowances.
- Resolution of client complaints such as allegations that an owner was collecting rent on vacant apartments.
- Tracking of occupancy data and reports for all 700 properties overseen by the [City] office.

Such examples concern conventional occupancy management tasks and problems, but not the full range of housing activities and unusually difficult problems expected at Level 2-4. The assignments and problems the appellant cites have well precedented approaches and solutions as expected at Level 2-3.

The appellant's use of terminology like 'technical expert' or 'technically authoritative' is inconsistent with the classification standard's use of the terms. A technical authority or expert under the standard regularly resolves highly complex problems that confound even highly experienced Specialists, rather than the general public or Specialists working outside the field, as the appellant's usage implies. The advice he provides concerns recurring problems that Specialists at Level 2-3 independently handle and is appropriately credited at that level.

We evaluate this factor at Level 2-3 and credit 275 points.

FACTOR LEVEL POINT SUMMARY

Factor	Level	Points
1	1-6	950
2	2-3	275
3	3-3	275
4	4-3	150
5	5-3	150
6	6-3	60
7	7-3	120
8	8-1	5
9	9-1	5
	Total:	1990

The table above summarizes our evaluation of the appellant's work. As shown on page 9 of the standard, a total of 1990 points falls within the GS-9 grade range (1855-2100).

Decision

The proper classification of the position is Housing Management Specialist, GS-1173-9.