

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

San Francisco Oversight Division  
120 Howard Street, Room 760  
San Francisco, CA 94105-0001

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

**Appellant:** [The appellant]

**Agency classification:** Building and Property Management  
Specialist  
GS-1101-11

**Organization:** [The appellant's organization]  
Bureau of Land Management  
U.S. Department of the Interior

**OPM decision:** GS-1101-11; title at agency discretion

**OPM decision number:** C-1101-11-02

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Carlos A. Torrico  
Classification Appeals Officer

June 18, 2001  
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:**

[The appellant's address]

### **Agency:**

[The appellant's servicing personnel office]  
Bureau of Land Management  
U.S. Department of Interior

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## **Introduction**

On February 23, 2001, the San Francisco Oversight Division of the U.S. Office of Personnel Management (OPM) received a classification appeal from [the appellant]. Her position is currently classified as Building and Property Management Specialist, GS-1101-11. However, she believes the position should be classified as Space and Property Management Specialist, GS-301-12. The appellant works in the [appellant's organization and installation], Bureau of Land Management (BLM), U.S. Department of the Interior. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

## **General issues**

This appeal decision is based on a careful review of all information submitted by the appellant and her agency. In addition, to help decide the appeal, an Oversight Division representative conducted separate phone interviews with the appellant and her current supervisor. Both the appellant and her supervisor have certified to the accuracy of the appellant's official position description (PD).

The appellant compares her position to several GS-12 positions in other BLM State Offices that she believes are similar to her job. Therefore, she feels that her position should be classified at the GS-12 level. By law, we must classify positions by comparing their current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's position to others as a basis for deciding her appeal.

## **Position information**

The appellant's position is located in the [appellant's organization]. She is responsible for developing statewide guidance for personal property management, space management, building management, fleet management, and energy conservation, and for overseeing these programs. In addition, she manages the disposal of personal property and some real property for the [appellant's installation]. The appellant provides guidance and assistance to staff in six field offices who carry out the property accountability and management functions for their respective units.

The results of our interviews, the appellant's PD and other material of record furnish more information about her duties and responsibilities and how they are performed.

## **Series, title and standard determination**

The agency has assigned the appellant's position to the Business and Industry Group, GS-1100, and classified it in the General Business and Industry Series, GS-1101. We concur with the agency's determination. Similar to positions in the GS-1100 Group, the work performed by the appellant includes advising on and administering programs that require knowledge of business and trade practices, the characteristics and use of equipment, products and property, the conduct of related investigations and studies, the collection, analysis, and dissemination of information,

the provision of advisory services, etc. In the appellant's position the purpose of this knowledge is to manage property, both real and personal, to advise field managers on the best way to house their staff and functions, and to conduct studies and investigations. She collects, analyzes and distributes information, and administers regulatory provisions and controls. In carrying out her duties, she performs a combination of work covered by the GS-1100 Group including aspects of property management and related disposal, and building management. Such work is generally covered by the Industrial Property Management Series, GS-1103, and the Building Management Series, GS-1176, respectively. Therefore, the appellant's position is best assigned to the General Business and Industry Series, GS-1101. Positions in that series perform a combination of work characteristic of two or more series in the GS-1100 Group, where no one type of work is series controlling and where the combination is not specifically included in another series. OPM has prescribed no titles for positions in the GS-1101 series. Therefore, in accordance with Section III. H. 2. of the Introduction to the Position Classification Standards, selection of an appropriate title is at the agency's discretion. However, in doing so the agency should follow the titling guidance in the introduction to the standards.

The appellant believes her position should be classified in the Miscellaneous Administration and Program Series, GS-301. That series includes positions the duties of which are to perform nonprofessional, two-grade interval work for which no other series is appropriate. The work requires analytical ability, judgment, discretion, and knowledge of a substantial body of administrative or program principles, concepts, policies, and objectives. We agree that the duties performed by the appellant also require analytical ability, judgment, and knowledge of program principles. However, they involve specialized work requiring specific knowledge of business and trade practices. As noted in the "coverage" section of the standard for the GS-301 series, dated January 1979, positions in that series involve specialized work for which no appropriate occupational series has been established. Guidance in the GS-301 standard excludes from that series positions which cannot be identified with a specific series, but are covered by another occupational group that has a general or miscellaneous series such as GS-1101. Therefore, for all of the preceding reasons, the GS-301 series is not appropriate for this position.

The appellant's space management and energy conservation duties occupy approximately 26% of her time. The work includes office layout and deciding on the most efficient approach for housing employees (i.e., lease, building construction or modification) covering the field offices, several recreation locations, and the State Office. While she does not perform the full scope of duties typical of positions in the GS-1176 occupation, we have evaluated that aspect of her work by cross-reference to the grading criteria in the standard for the Building Management Series, GS-1176, dated August 1971 (reissued in HRCD-7, July 1999). In addition to building managers the GS-1176 series covers building management specialists who specialize, in a line or staff position, in one or more program areas such as custodial management, energy efficiency, analysis of building management programs, and provide advisory services. The GS-1176 standard is used for grading building manager positions. However, it directs that the grades of building management specialists and other staff positions (like the appellant's) be evaluated by reference to the criteria in the Administrative Analysis Grade-Evaluation Guide (AAGEG), dated August 1990 (reissued in HRCD-7, July 1999).

The appellant spends up to 60% of her remaining work time performing property management and related disposal activities. While she does not perform the full scope of duties typical of positions in the GS-1103 series, we have evaluated those duties by cross-reference to the grading criteria in the standard for the Industrial Property Management Series, GS-1103, dated August 1969, (reissued in HRCD-7, dated July 1999). Our evaluation of the appellant's duties in comparison to the grading criteria in the guide and standard cited above follows.

## **Grade determination**

### *Evaluation of building and space management duties*

The AAGEG uses the Factor Evaluation System (FES), which employs nine factors. Under the FES, each factor level description in a standard describes the minimum characteristics needed to receive credit for the described level. Therefore, if a position fails to meet the criteria in a factor level description in any significant aspect, it must be credited at a lower level. Conversely, the position may exceed those criteria in some aspects and still not be credited at a higher level. Our evaluation with respect to the nine FES factors follows.

#### *Factor 1, Knowledge required by the position, Level 1-7, 1250 points*

At Level 1-7 (pages 8-9), the work requires knowledge and skill in applying analytical and evaluative methods and techniques to issues concerning efficiency and effectiveness of program operations carried out by administrative or professional personnel. This includes knowledge of pertinent laws, regulations, policies and precedents affecting the use of program and related support resources (people, money, or equipment.) This 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.

At Level 1-8, (pages 10-11) in addition to the knowledge of the next lower level, the work 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. This level is reserved for 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.

Level 1-7 is met. Like that level, the appellant applies analytical and evaluative methods and techniques to assess building life-span, real-estate property values, building construction costs, work functions, and office layout in order to decide how best to house BLM staff. When the number of employees assigned to a location changes significantly (such as the addition of staff for the Emergency Fire Rehabilitation program) the incumbent must determine how they should be housed, considering the number of staff and type of equipment and vehicles required by the program. Based on her evaluation, she recommends whether to modify the facilities on a current site, lease an appropriate amount of space in another building within the same community, or purchase land and construct a new facility. Although the manager of the program/field office to

be housed may favor one alternative, the appellant's analysis might reveal that another alternative is more cost-effective and also more consistent with the Bureau's policies regarding ownership of office buildings.

The appellant describes a number of documents she must be familiar with, including space management directives and regulations, and leasing/contracting directives and regulations. She states that her work requires knowledge of various construction methods to requisition real property alterations or improvements, as well as real property management directives and regulations. These documents are characteristic of Level 1-7 in that they deal with pertinent laws, regulations, policies and precedents affecting the use of program and related support resources (people, money, or equipment.) Like Level 1-7, she uses her knowledge to evaluate and recommend ways to improve the effectiveness and efficiency of work operations in a support function (space management).

The appellant's assignments and responsibilities do not meet Level 1-8. Unlike that level she is concerned with internal Bureau regulations as well as the regulations of the General Services Administration for an administrative function (space management), rather than being concerned with the laws, policies, and regulations applicable to one or more important public programs (examples within the Bureau might include programs such as controlling the population of wild horses and burros or managing grazing land). As described at Level 1-8, study objectives are to identify and propose solutions to problems, which are characterized by their breadth, importance, and severity, where established management techniques are frequently inadequate. The appellant's studies almost always involve established and adequate management techniques. Finally, at Level 1-8 the proposals made involve substantial agency resources, require extensive changes in established procedures, or may be in conflict with the desires of the activity studied. By contrast, the appellant's work has not resulted in extensive changes in established procedures, has not involved substantial agency resources, and usually is not in conflict with the desires of the activity studied.

This factor is evaluated at Level 1-7 and 1250 points are credited.

*Factor 2, Supervisory Controls, Level 2-4, 450 points*

At Level 2-4 (page 12), the employee operates within a framework of priorities, funding, and overall project objectives. The employee and supervisor develop a mutually acceptable project plan that 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. The supervisor is kept informed of potentially controversial findings, issues, or problems with widespread impact. Completed work is reviewed by the supervisor for compatibility with organizational goals, guidelines, and effectiveness in achieving intended objectives.

At Level 2-5 (pages 12-13), the employee is a recognized authority in the analysis and evaluation of programs and issues, and is subject to only 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 of programs. Work products developed by the employee are normally reviewed only for potential influence on broad agency policy objectives and program goals.

The appellant's position fully meets level 2-4. Like that level her supervisor provides leadership, and defines the scope and timelines of the work. The appellant coordinates her activities with her supervisor and with the manager for whom she is providing space management services. Work assignments are received in the form of requests from within the office which are developed into project plans. Like Level 2-4, she independently plans and organizes her work, estimates costs, and coordinates with other staff concerning certain phases of the space management project. She informs her supervisor of progress by informal briefings and advises him of critical or controversial issues. He evaluates her work based on its effectiveness in meeting project objectives and providing acceptable service to the employees of the [appellant's installation] and field offices.

The appellant's position does not meet Level 2-5. The appellant's work assignments do not require her to carry out major projects concerned with evaluating a major Bureau program, nor is her work reviewed only for potential influence on broad agency policy objectives and program goals. The oversight provided by her Branch Chief and his supervisor, the Deputy State Director for Support Services, as well as the manager of the office for whom she is providing services, precludes her from exercising the degree of independence and freedom from supervision described at Level 2-5.

This factor is evaluated at Level 2-4 and 450 points are credited.

*Factor 3, Guidelines, Level 3-3, 275 points*

At Level 3-3 (page 13), 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 in the guidelines are not always directly applicable to specific work assignments, however precedent studies of similar subjects are available for reference. When the subject studied is covered by a wide variety of administrative regulations and procedural guidelines, the employee must use judgment in determining the relationship between guidelines and program effectiveness.

At Level 3-4 (pages 13-14), guidelines consist of general administrative policies and organizational theories that require considerable adaptation and/or interpretation for application to issues and problems studied. The administrative guidelines generally cover program goals and objectives of the employing organization. Within the context of broad regulatory guidelines the employee may refine or develop more specific guidelines, such as methods for measurement and improvement of effectiveness and productivity.

Guidelines available to the appellant meet Level 3-3, and consist of standard reference materials and manuals. For example, she works within guidelines developed by the General Services Administration (GSA) that indicate the amount of space allotted to various functions and levels of employees, and Bureau of Land Management guidelines regarding the procedures for leasing

space, or for returning property to the local market. Like Level 3-3, some guidelines are not directly applicable to a specific assignment, so she uses judgment in adapting more specific guidance for the State Office based on her understanding of the Bureau and GSA guidance.

The appellant's guidelines do not meet Level 3-4. The appellant works with guidelines specifically developed for the purpose of space management, and while she may be called upon to choose between alternative methods, she is not required to significantly adapt or interpret guidelines to the extent described at Level 3-4.

The appellant contends that she is responsible for interpreting or revising existing policy for use by others, and that this exceeds the level of guidelines at which her position was evaluated. However, Level 3-3 includes situations in which the employee interprets or adapts available guidelines to specific issues or subjects studied. By contrast, at Level 3-4 guidelines are very general, and require considerable adaptation and or interpretation for application to issues and problems studied. There is no evidence in the record to indicate that she has exercised such responsibility to considerably adapt or interpret general administrative policies and management and organizational theories.

This factor is evaluated at Level 3-3 and 275 points are credited.

*Factor 4, Complexity, Level 4-4, 225 points*

At Level 4-4 (pages 15-17), 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. Projects at this level usually consist of issues, problems, or concepts that are not always susceptible to direct observation and analysis. 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 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.

At Level 4-5 (pages 17-18) the work deals with substantive mission-oriented programs, where assignments require developing detailed plans, goals, and objectives for the long-range implementation and administration of the program. Decisions about how to proceed are complicated by conflicting program goals and objectives which may derive from changes in legislative or regulatory guidelines. Options, recommendations, and conclusions developed by the employee take into account and give appropriate weight to uncertainties about the data and other variables which affect long-range program performance.

The appellant's work meets Level 4-4. Similar to work at that level, the appellant gathers/creates cost data from a variety of sources when the data may not be for the same time period or be computed in the same way. Examples include costs of current space, whether leased or owned, depreciation of Bureau owned property, market value of similar sites, anticipated change in workforce size, and needs for specialized facilities (labs, warehouses, housing, etc.). The information is used to analyze space management issues and resolve problems impacting on the



efficiency of the organization. Some of the information cannot be directly observed. Her work can be complicated by the preferences of the organization she is working with, in which case she also needs to address their cost information for consistency in the way it was gathered and the items included or not included.

The appellant believes that she analyzes major program issues and their relationships to each other, and also develops long-range program goals and objectives, as would be found at Level 4-5. As an example she offers her role in determining whether to assign a limited asset (in this case vehicles and equipment) to one or another program within the State. She states that when one program has a heavier need for these assets than the other, the assets may be moved from one to the other in order to accomplish the work goals of both programs. This is like Level 4-4 where the employee analyzes an issue and recommends a resolution that would improve the effectiveness and efficiency of a particular operation.

In addition, in discussion with the appellant's supervisor, he indicated that most often the appellant's role is to recommend the best use of the asset, but she does not have final decision authority. Even her supervisor does not always have that authority. As an example, he said that if the conflict is between two organizations under one Deputy State Director, the decision would often rest with the Deputy. Her supervisor also indicated that if both programs have a justified need for an asset, both will eventually get what they need, although the more urgent need would be met first.

We find that the appellant's work does not meet Level 4-5. Her assignments deal with discrete application of guidance regarding the space needs of individual functions or field offices. She is not involved in assignments that require an evaluation of changes in legislative and regulatory requirements. She does not deal with conflicting program goals, but rather with potentially conflicting preferences for space or other assets. Further, the appellant is not involved in analyzing or formulating agency requirements or overall systems concepts; her space management work pertains specifically to the needs of the [the appellant's installation] and subordinate field offices.

This factor is evaluated at Level 4-4 and 225 points are credited.

*Factor 5, Scope and Effect, Level 5-3, 150 points*

At Level 5-3 (pages 19-20) the purpose of 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. Sometimes they are required to develop detailed procedures and guidelines to supplement established administrative guidance. Completed recommendations influence decisions by managers concerning the internal operations of the organizations and activities studied.

At Level 5-4 (pages 20-21), the work is intended 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 staff activities. Work involves establishing

criteria to measure and/or predict the attainment of program or organizational goals and objectives, and contributes to improving efficiency in program operations. Work affects the plans, goals, and effectiveness of missions and programs at different echelons and/or geographical locations within the organization, and may affect the nature of administrative work done in components of other agencies.

Similar to Level 5-3, the purpose of the appellant's work is to plan and carry out projects to house employees of the [appellant's installation] in a cost effective and efficient manner. The appellant identifies, analyzes, and makes recommendations to resolve conventional problems in space management. She works as part of a team when major space changes are anticipated. Completed reports and recommendations influence decisions by her supervisor and the organization to be housed.

The appellant expressed concern that the agency did not give adequate consideration to her responsibility for interpreting or revising existing policy for use by others, and she provided examples of the types of guidance she has prepared. However, such responsibility is appropriately evaluated at Level 5-3. As stated in the standard (page 20), work at that level may involve developing detailed procedures and guidelines to supplement established administrative regulations or program guidance.

The appellant states that her work regularly affects a wide a range of BLM activities, major industrial concerns, or the operations of agencies outside BLM as found at Level 5-4. However, in determining housing needs, the focus of the appellant's work is not to assess the productivity, effectiveness, and efficiency of the agency's program operations, but rather to manage space for the benefit of the program concerned. Her assignments are directed at space utilization, and she accomplishes them by working within Bureau and GSA requirements, taking into consideration the desires of the program being housed. Although she deals with program managers in both the State office and subordinate field locations, there is no evidence in the record that her work directly affects the plans, goals, and effectiveness of missions and programs at different echelons. The effect of her work on activities outside BLM is indirect, as her efforts are focused on excessing property in an effective manner, rather than enhancing the efficiency of the organization that acquires the property. The appellant's work does not meet level 5-4.

This factor is evaluated at Level 5-3 and 150 points are credited.

*Factor 6, Personal Contacts and Factor 7, Purpose of Contacts, Levels 6-3/7-c, 180 points*

#### *Persons Contacted*

At Level 6-3 (page 24), contacts include persons outside the agency such as consultants, contractors, or business executives in a moderately unstructured setting. Contacts may also include heads of the employing agency or program officials several managerial levels removed from the employee when such contacts occur on an ad-hoc basis.

At Level 6-4 (page 24) contacts include high-ranking officials such as other agency heads, top congressional staff officials, mayors of major cities, or executives of comparable private sector organizations.

The appellant has contacts like those described at Level 6-3. They include persons both inside and outside the Bureau. Outside contacts include other Federal, State and local government staff members, contractors, developers, and real estate agents. She may also have dealings with program management officials in the Bureau Headquarters on an ad-hoc basis.

The appellant believes her contacts exceed Level 6-3. She cites as examples the dealings she had with State Senators and Congressmen when the Bureau exceeded its facility in [name of city and state]. However, unlike Level 6-4, her supervisor indicated that her primary recurring contacts are not with high ranking , top congressional staff officials. Usually she deals with staff members whose responsibilities are similar to hers, that is, property management or facilities management. He confirmed that she might get occasional calls from a County Supervisor asking for information about excess property. However these calls are not regular and recurring. Based on this, we cannot say that her regular personal contacts extend to high-ranking officials such as top congressional staff officials, state executives or legislative leaders, as found at Level 6-4.

This factor is evaluated at Level 6-3.

#### *Purpose of Contacts*

At Level 7-c (page 25), 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 or competing objectives.

At Level 7-d (page 25), contacts are 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.

The purpose of the appellant's contacts is like Level 7-c. She influences her supervisors and the affected program managers to accept and implement her recommendations on the appropriate space for housing a particular function or office. She may encounter resistance due to competing objectives, such as when a manager wants to build a new facility but the appellant recommends making modifications to the existing space. This is consistent with Level 7-c in the guide.

Unlike Level 7-d, the appellant is not called upon to justify or settle matters involving significant or controversial issues affecting major programs or significantly changing the nature and scope of organizations.

Using the matrix on page 25 of the guide, Factors 6 and 7 are evaluated at Levels 6-3/7-c and a total of 180 points are credited.

*Factor 8, Physical Demands, Level 8-1, 5 points*

At Level 8-1 (page 26) the work is primarily sedentary, although some slight physical effort may be required. This is the appropriate level for this position as the appellant works primarily in an office setting. Level 8-2 (page 26) is not met as the appellant's assignments do not regularly involve long periods of standing, bending, and stooping to observe and study work operations in an industrial, storage, or comparable work area.

This factor is evaluated at Level 8-1 and 5 points are credited.

*Factor 9, Work Environment, Level 9-1, 5 points.*

At Level 9-1 (page 26), work is typically performed in an adequately lighted and climate-controlled office. The appellant's position meets Level 9-1 as she regularly works in an office setting which is adequately lighted, heated, and ventilated. The position does not meet Level 9-2 (page 26) as her assignments do not regularly include visits to manufacturing or other industrial areas involving moderate risks or discomforts, where protective clothing, gear, and observance of safety precautions are required.

This factor is evaluated at Level 9-1 and 5 points are credited.

In summary, we have evaluated the appellant's building and space management work as follows:

**Factor Level Summary**

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge required by the position	1-7	1,250
2. Supervisory controls	2-4	450
3. Guidelines	3-3	275
4. Complexity	4-4	225
5. Scope and effect	5-3	150
6. Personal contacts and 7. Purpose of contacts	6-3/7-c	180
8. Physical demands	8-1	5
9. Work environment	9-1	5
	Total points	2,540

The appellant's duties total 2540 points which fall in the GS-11 range (2355-2750). Therefore, in accordance with the grade conversion table on page 5 of the guide, this work is properly graded at GS-11.

*Evaluation of property management and disposal duties*

As previously noted, we have evaluated the appellant's property management and disposal duties by cross-reference to the grading criteria in the classification standard for the Industrial Property

Management Series, GS-1103. The standard uses two factors to grade positions: (1) Nature of Assignments and (2) Level of Responsibility.

### Nature of Assignments

This factor reflects the scope and difficulty of assignments, and the nature and purpose of personal contacts.

At the GS-11 level (pages 15-18), the industrial property management specialist serves as a resident or nonresident property administrator with full responsibility for the property management program within a specified area or location. The GS-11 property administrator has responsibility for surveillance and control of large amounts of Government property under a more complex property control system than that found at the GS-9 level. At the GS-11 level property is difficult to control because of the varied types of property and different control methods and procedures, the dispersal of property records, and problems associated with maintenance and disposition of property. Personal contacts at the GS-11 level are generally with a variety of top officials of contractor firms and/or other government officials on more complex property control program matters with greater potential impact on diversified operations.

At the GS-12 level (pages 19-23), assignments involve full responsibility for maintaining control over a wider variety and larger amount of Government property as compared to the GS-11 level. The property requires various and complex automated and manual control techniques and procedures to meet the specific needs of the organizations serviced. At this level there may be tens of thousands of line items to be controlled. Items include a large amount of consumable materials for work in process, and at least substantial quantities in most of the seven remaining types of property (i.e., special tooling, special test equipment, industrial plant equipment, other plant equipment, military property, real property, and salvage and scrap) with each type requiring distinctly different methods for management and control. The property is used in connection with such complex activities as the research, development, testing, and manufacture of space, aircraft, weapons or other equipment systems or subsystems; or the production and/or overhaul of different kinds of equipment systems requiring diverse manufacturing process and plan operations which encompass more than one major commodity or industrial activity.

The appellant's assignments favorably compare to the GS-11 level. Like that level, the appellant serves as a resident property administrator for the property within the [appellant's installation] building complex, and as non-resident administrator for the property at six field offices. Due to the number and variety of property, a complex property control system is required. There are a variety of types of property being controlled. These include a total of 3,123 personal property items tracked in the automated property system; other personal property deemed "Bureau sensitive" (over 6,000 items); real property; laboratory equipment; some consumables such as seed for fire rehabilitation; law enforcement equipment; and a variety of vehicles (477 street vehicles, emergency vehicles, and over 30 pieces of heavy equipment), which are tracked in a different system. For the "sensitive" personal property, which is not included in the fixed asset system because it does not meet the dollar threshold (items such as cell phones, laptop computers, cameras,) the incumbent has devised her own informal tracking system to monitor property location and accountability. Complicating the management of vehicles is the fact that different vehicle types require differing methods of determining their life span before

disposition, and the incumbent has the authority to deviate from normal disposition schedules if she determines that vehicle condition and use warrant that action.

Although the appellant controls property through property managers who are also Federal employees, rather than through contractors as envisioned in the standard, the other characteristics of her work are similar to those found at the GS-11 level. She controls large amounts of property, and there are substantial quantities in each of four or five different types of property controlled, with each type requiring distinctly different methods for management and control.

The property controlled by the appellant is used in very different settings. Some of it is used for fire fighting, some for research, some in support of recreation, some for land rehabilitation, some in support of the Bureau's [names of programs], and some in support of office work. Like the GS-11 level, property records are maintained in various divisions and organizations (dispersed throughout the State) and must be coordinated, and sometimes problems associated with identification, use, maintenance and disposition are encountered. In addition to her line role for surveillance and control, the appellant also has staff responsibility for issuing guidance for all [appellant's installation] employees regarding property accountability and record maintenance. In this role she interprets Bureau guidance and provides direction to the property managers within the State.

The appellant's personal contacts and their purpose, are also similar to those found at the GS-11 level. She deals with top management officials throughout the [appellant's installation] and as necessary in the Bureau Headquarters to resolve problems of noncompliance with the approved property control procedures. Last year she conducted assistance visits to seven sites within the State to evaluate the adequacy of the property control system, conformance of records, determine the level of records' maintenance, examine donation agreements, and assess the accuracy of disposal methods. She explained her findings and justified her recommended changes, then worked with field office officials to correct deficiencies. She works with the same field officials to encourage timely disposition of property which is no longer needed. Similar to the GS-11 level, she also negotiates with other government representatives within the Federal government but outside the Bureau of Land Management, as well as officials in State and local agencies, to coordinate administrative matters and arrange for the acquisition or disposal of excess property.

The appellant's nature of assignments does not meet the GS-12 level. The appellant controls primarily real property, personal property, and a variety of vehicles used for land management activities. At most she deals with only a few consumables used in program accomplishment (other than standard office supplies.) There is no evidence in the record that the appellant deals with large amounts of consumable materials for work in progress, or with most of the seven property types described at the GS-12 level. Neither the number of items, their quantity and variety, nor the complexity of property control systems used by the appellant meet the GS-12 level.

Nature of Assignments is evaluated at the GS-11 level.

### Level of Responsibility

This factor reflects the degree of supervision received, and the nature and complexity of decisions and recommendations.

At the GS-11 level (pages 18-19), the resident property administrator typically receives general administrative supervision at the site from a supervisor with broad responsibilities for contract administration, and technical supervision from staff or supervisory industrial property specialists at a regional or district headquarters. The GS-11 nonresident property administrator typically works under the technical supervision of a supervisor located in a district or field office. Work assignments and objectives are prescribed, but methods of accomplishment are seldom reviewed or controlled while work is in progress. The GS-11 property administrator has full authority and responsibility for developing plans and accomplishing the total property control program for the assigned contractors (agency facilities in this case.)

At the GS-12 level (page 23), the standard indicates that the property administrator works under the same type of supervisory controls as described at the GS-11 level, but the responsibility is greater because of the greater scope and complexity of assignments typical of the GS-12 level.

The appellant's level of responsibility meets the GS-11 level. Similar to that level, she receives general administrative supervision from the Branch Chief, and technical supervision from the industrial property specialists in Bureau Headquarters. Her supervisor expects her to plan and carry out the property control and disposal programs, keeping him only informed of critical or controversial issues. Work is evaluated based on her effectiveness in providing service, and the overall adequacy of the property control program. The appellant does not meet the GS-12 level of responsibility. Although she independently performs her work, it is done within the context of GS-11 level assignments. Thus this factor must be evaluated at GS-11.

With both the Nature of Assignments and the Level of Responsibility evaluated at the GS-11 level, the appellant's property management and disposal work overall is evaluated at GS-11.

### *Summary*

By application of the grading criteria in the Administrative Analysis Grade Evaluation Guide, and the standard for the Industrial Property Management Series, GS-1103, the appellant's duties and responsibilities equate to the GS-11 level. Therefore, the position is graded at that level.

### **Decision**

The proper series and grade for the appellant's position is GS-1101-11. Selection of an appropriate title is at the agency's discretion.