

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

Chicago Oversight Division
230 S. Dearborn Street, DPN-30-6
Chicago, IL 60604-1687

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

Appellant: [Name]

Agency classification: Supervisory Economic Development Specialist
GS-1101-13

Organization: One Stop Capital Shop
[City] District Office
Small Business Administration
[City, State]

OPM decision: Supervisory Economic Development Specialist
GS-1101-13

OPM decision number: C-1101-13-02

/s/ (Douglas K. Schauer)

Douglas K. Schauer
Classification Appeals Officer

September 26, 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:

[appellant's name and address]

Agency:

[name and address of appellant's
servicing personnel office]

Ms. Carolyn J. Smith
Assistant Administrator for Personnel
U.S. Small Business Administration
Washington, DC 20416

Introduction

On May 3, 2001, the Chicago Oversight Division of the Office of Personnel Management (OPM) accepted a classification appeal filed by [Appellant]. The appellant is employed as Chief of the One Stop Capital Shop (OSCS) in the [City] District Office, Small Business Administration, in [City, State]. At the time the initial appeal was filed on April 6, 2001, [Appellant's] position was classified as a Lead Economic Development Specialist, GS-1101-13. She felt that this classification was incorrect and should be instead a Supervisory Economic Development Specialist, GS-1101-14. Subsequent to the date of the original appeal the position was reviewed by the servicing personnel office, the Office of Human Resources, [Name] Center in [City, State], and the position was rewritten and reclassified to Supervisory Economic Development Specialist, GS-1101-13. Because the minor changes to the position description did not change her fundamental job or her belief that the position should be classified at the higher grade, we have continued the position classification appeal process. The appellant was interviewed on August 17, 2001, to ascertain the actual duties and responsibilities performed. The appellant's supervisor, the servicing human resources specialist, and the chief of the Office of Human Resources were also interviewed.

General issues

[Appellant] states that her position description is identical to a standardized GS-1101-14 position description used within the agency. She states that when the OSCS Shop positions were filled under the SBA's Empowerment Zone Initiative, each chief's position was filled at the GS-14 level using this position description. Like OPM, the appellant's agency must classify positions based on comparison to OPM standards and guidelines. However, the agency also has primary responsibility for ensuring that its positions are classified consistently with OPM appeal decisions. We have asked the agency to ensure that the relevant classification guidance provided in this appeal decision be applied to all OSCS chief positions through the SBA. If the positions are not the same as the appellant's as to duties and responsibilities, the agency should explain to her the differences between her position and the others.

The appellant states that she has more supervisory responsibilities than some of the GS-14 OSCS managers. By law, we must classify positions solely by comparing their current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since comparison to OPM standards is the exclusive method for classifying positions, we cannot compare the appellant's position to others as a basis for deciding this appeal.

Position information

The appellant is chief of the [City] OSCS which services the eastern half of the State of [Name]. A field component of the eastern [State] SBA District, the OSCS was originally set-up to promote SBA services to underserved markets in the district. Her office actually services all potential customers in the district, not only those traditionally underserved. As stated in the position description, the mission of the OSCS is to promote and to foster business development activity through the support and use of leveraged external resources from the entire community to include the private sector, other government programs, and any other resource that would

assist local small businesses. The OSCS markets the program to potential small business entrepreneurs within the area, as well as potential business investors such as banks. The OSCS employees represent a wealth of knowledge of Federal, state and local business investment programs available, of potentially available private investment resources, and other resources in the form of experienced business counselors to provide guidance and assistance. OSCS employees are also well versed in the policies, requirements and procedures for arranging or underwriting financial loans for business entrepreneurs. The OSCS provides hands-on assistance, maintains a Business Information Center, provides instruction, and maintains a reference library in the form of hundreds of relevant books and computer programs.

The appellant's position is that of the office manager or chief, and the principal marketer of the OSCS program within the district to potential customers, influential interested parties and assistance providers. She also serves as a worker in the office providing assistance to customers, financial specialists and business acumen providers, and accomplishing a variety of specialized administrative work concerned with SBA programs.

The appellant's office has 11 total personnel assigned. According to the appellant, she spends approximately one third of her time in managing the operations and personnel in the OSCS office. This includes at least 25 percent of her time occupied in supervising personnel. As office manager she sets goals and objectives for the OSCS, ensures that the office is functioning efficiently and effectively, evaluates mission effectiveness, prepares and submits reports, and performs other related work.

Another third of the appellant's time is occupied in marketing the SBA OSCS programs. She maintains regular and recurring contact with a variety of governmental entities, private concerns, and the press to push support for the programs. She also meets regularly with community and civic groups to encourage entrepreneurial efforts and to inform potential customers of the availability of SBA and OSCS programs. Her contacts with governmental representatives include the mayor of [City] and other cities, Congressional staff members, and high level representatives of other Federal, state and local governments. She meets regularly, as well, with representatives of the business community to include bankers and business assistance volunteer organizations.

The last third of the appellant's time is spent as a journeyman specialist performing the work for which the OSCS was established. She counsels loans applicants, provides them instruction, assists them in filling out forms, updates available information offerings, etc.

Series and title determination

The position is currently classified to the General Business and Industry Series, GS-1101, which is the general occupational series for positions properly assigned to the Business and Industry Group, GS-1100, when no established occupational series is appropriate. Based upon both the nonsupervisory and supervisory duties, the title of Supervisory Economic Development Specialist has been assigned by the servicing Human Resources Office. The appellant does not disagree with either the series or title assigned, and we concur.

Grade determination

Both the nonsupervisory and supervisory work performed by the appellant will be evaluated to determine the proper grade.

Nonsupervisory Work

There is no occupational standard in the GS-1100 group of occupations which covers the work performed by the appellant. In cases such as this we are instructed to compare the position to other published classification standards that provide adequate grading criteria. The servicing Human Resources Office elected to use the Public Affairs Series, GS-1035 position classification standard to grade the nonsupervisory work. Although it is not in the GS-1100 Business and Industry Group, they deemed it an appropriate standard to use to grade the marketing and public relations work required and performed by the position. We concur in the use of this standard to grade the nonsupervisory work. GS-1035 is written in Factor Evaluation System (FES) format. FES identifies nine different factors common to all positions. A position being evaluated is compared to different levels described for each factor, and each factor level has a different point value assigned based upon difficulty or complexity. The total of points assigned for all nine factors is compared to a grade conversion chart in the standard to arrive at a final grade.

Each factor level description is the threshold for that level. That is, it describes the lowest level for the level addressed. One cannot assign a position to a higher level because the position exceeds the next lower level and meets most aspects of the higher level. The position must meet all aspects of a particular level in order to be credited at that level. Because the appellant did not specifically identify the factor level assignments with which she disagrees, we will compare her position with those factors most likely to adequately address her questions.

Factor 1, Knowledge Required by the Position:

At Level 1-7, positions perform duties requiring the application of knowledge of a wide range of oral and written communication principles, practices, techniques and methods, analytical methods, and interpersonal relations practices. Such knowledge is used in modifying standard methods and adapting accepted approaches to develop new information materials aimed at enhancing the understanding of groups or individuals of the significant issues of an agency's program. They use this knowledge in assessing public reaction and identifying the extent of understanding in order to evaluate the information programs. They need this level and skill to explain significant issues to generally responsive groups or individuals interested in the agency's programs.

At the 1-8 level the work of specialists requires a mastery of communication principles, methods, practices and techniques, analytical methods, and interpersonal relations practices. The employee uses such knowledge and skill in developing and applying new approaches to the most difficult and complex public affairs programs of an agency by developing or evaluating information programs enhancing understanding among publics opposed or indifferent to agency programs. Illustrative of this level is "Knowledge and skill sufficient for presenting ideas in written materials in new ways that will increase understanding among publics with varying

levels of comprehension of agency programs and policies, or opposition or indifference to the agency's program objectives.”

Level 1-9 is appropriate for positions which utilize a mastery of communication principles, methods, practices and techniques, analytical methods, and interpersonal relations practices to develop new methods and approaches in planning, integrating and evaluating the overall public affairs program for an agency's functional program. Some specialists at this level advise other specialists in the agency on issues involving the application of communication practices in developing or enhancing public affairs matters involving interaction with all of the agency's publics. Others serve as the internal expert to the agency's top management officials participating in the formulation and articulation of an overall plan integrating the public affairs issues of the agency.

The appellant's position is a match to Level 1-8 for this factor. This position does not compare favorably to Level 1-9 because the appellant does not serve as the expert to top agency, i.e. SBA, management officials in the formulation of an overall public affairs plan, and she does not advise other public affairs specialists in the agency on activities involving all of the agency's publics. Her work does meet Level 1-8, however, in that she uses a mastery of oral and written communication skills and knowledge in order to develop and apply new approaches to difficult and complex missions of the SBA. To make a relatively new program succeed, she has to develop new approaches to problems that have been very resistant to solutions in the past, such as convincing reluctant financial institutions to lend money to historically poor investment risks and establishing a positive climate for business growth by convincing community officials to support the program materially as well as rhetorically. The appellant's supervisor stated that as the first chief of an OSCS in [City] she was expected to determine the approaches necessary to meet the goals of marketing the organization's mission to the various communities' decision makers and sources of support.

Factor 2, Supervisory Controls:

Factor Level 2-4 is appropriate for positions that receive assignments from a supervisor in terms of overall objectives and resources available. The employee and supervisor jointly develop deadlines, projects and the nature of the planned assignments. The specialist is responsible for planning and carrying out the assignment including resolving most problems that occur, coordinating the work with others, interpreting policy, determining the approach to be taken, and selecting the methods and techniques to be employed. Completed work is reviewed in terms of meeting program objectives, responsiveness, and conformance to agency policy.

At Level 2-5 an employee receives only administrative direction from the supervisor. He/she receives assignments in terms of the broadly defined mission or function of the organization's public affairs program. The employee is responsible for independently planning, designing, and carrying out the public affairs programs, campaigns, projects, studies or other major program functions, informing the supervisor of progress as appropriate. Results are considered technically authoritative and are normally accepted without significant change. If the work is reviewed, the review concerns such matters as fulfillment of program objectives or the effect of the specialist's advice in facilitating achievement of the functional program objectives.

While the supervisory controls exercised over the appellant's position have similarities to Level 2-5, they do not fully meet that level. This is most notable in the way work is assigned. The appellant's supervisor, the District Manager, is responsible for the SBA programs in his district to include those under the direct responsibility of the appellant. He assigns work to the OSCS chief by identifying the program objectives and operating requirements. He sets up the OSCS in conformance with SBA directives, assigns the SBA resources to be dedicated to the operation, and oversees its operation. This exactly matches Level 2-4 for this factor. The appellant works very independently from this point. She independently makes contact with the various parties, e.g., potential entrepreneurs, potential lenders, civic leaders, volunteer organizations, etc., and coordinates their efforts on behalf of the mission of the OSCS. She informs the District Manager of the status of work by providing him reports showing him the progress and success in meeting objectives. The most appropriate level for this factor is 2-4.

Factor 3, Guidelines:

At Level 3-4 guidelines consist of agency policy statements or broad precedents and are applicable in establishing a general program direction or setting a tone, but are not totally sufficient for dealing with the more complex, intricate or unusual situations, issues or problems encountered on a continuing basis. The specialist is required to deviate from standard approaches in developing new ways to communicate the agency's message on controversial and sensitive issues where public reaction has been negative or indifferent, and understanding by the agency publics of programs is essential to the success of the agency missions.

At Level 3-5 guidelines usually consist of only general policy statements and statutory mandates, and there are no precedents applicable to unusual or sensitive issues or problems encountered in the employee's typical assignments. The specialist must exercise considerable judgment in interpreting and adapting existing precedents and using them as a foundation for developing new approaches that coordinate and integrate various aspects of the agency's mission in creating a unified public affairs strategy or plan. Often, the employee is recognized as the agency authority in the development and interpretation of guidelines in the public affairs area.

The OSCS concept is a relatively new one, with SBA policy guidance available and some specific guidance available concerning the technical aspects of the work. Also, the District Manager provides advice and guidance to the appellant when he feels it necessary and when she asks. However, it requires considerable innovation on the part of the chief to make it a success. The appellant must draw upon an extensive well of experience in convincing somewhat reluctant potential entrepreneurs, lenders, and business counselors to cooperate in order to meet the goals of the OSCS program. This latter is covered by few guidelines, and precedents, when available, are seldom directly applicable to the situations encountered. This is characteristic of Level 3-4. It does not meet Level 3-5, because there are some guidelines available which cover the work performed. At the higher level, guidelines consist for the most part of general agency policy guidance and laws, and there are no precedents available to cover unusual or sensitive issues.

In the appellant's classification appeal to the agency, the SBA credited Level 3-5 for this factor, but we disagree. Level 3-5 is meant to apply to only the highest positions in the agency. The

standard states that at this level specialists “must exercise considerable judgment in interpreting and adapting existing precedents and using them as a foundation for developing new approaches that coordinate and integrate various aspects of the agency’s mission in creating a unified public affairs strategy or plan.” This implies that to be credited at this level a position must be responsible for planning or managing the agency’s public affairs program or many aspects of the agency’s program at a high echelon within the agency. This receives further credence from the next sentence in the standard that states that “frequently, the public affairs specialist is recognized as the agency authority in the development and interpretation of guidelines in the public affairs area.”

Although the appellant exercises a great deal of authority to adapt guidelines or develop new ones for the OCS program, her program is but a portion of the SBA’s mission, and her OCS is one of many located throughout the country. The breadth of her work is not representative of the level described at the 3-5 level. Consequently, the inadequacy or lack of guidelines cannot be credited at this level. The appellant’s position is properly credited at Level 3-4.

Factor 4, Complexity:

For positions credited at Level 4-5 the work includes the development of new methods, strategies and communication plans covering the complete spectrum of the organization’s programs. This involves presenting information on a wide variety of subjects using the full array of written and oral presentation formats and techniques. It requires establishing and maintaining effective working relationships in achieving an understanding with groups indifferent to or having opposing points of view to programs and policies. Decisions regarding what needs to be done include evaluating the appropriateness of existing strategies and plans in light of changes in program emphasis or content, and shifts in public reaction to or understanding of the programs. The work requires developing new ways of gathering input from a variety of individuals and groups with conflicting views and interests, and developing and initiating varied approaches and strategies in communicating the agency’s objectives to groups opposed or indifferent to agency programs.

At Level 4-6, positions perform work that consists of developing new methods and approaches in planning, integrating, and evaluating the overall public affairs program for an agency’s functional program and advising other public affairs specialists in the agency on the application of communication practices, or counseling agency management on the formulation and articulation of an overall approach to public affairs issues in the agency. Decisions regarding what needs to be done require the analysis of the agency’s most difficult and complex public affairs problems and issues and determining new approaches for informing various individuals and key groups about the agency’s program; obtaining public reaction through an analysis of written and oral presentations or interpersonal involvement; and developing new communication strategies in presenting information programs that successfully fulfill the needs of agency publics in understanding programs and policies. At this level the work requires continuing efforts in developing, evaluating and integrating various public affairs activities into a unified communication plan that facilitates the agency’s achievement of program objectives requiring the establishment of effective communication interchanges with its various publics.

The appellant's work involves developing new methods, strategies and communication plans in order to reach the various publics pertinent to the furthering of the SBA's OSCS mission and programs. The publics include potential and existing entrepreneurs and small businessmen in the OSCS zone of interest, high level bank officials and loan officers, members of the media, members of community organizations, volunteer groups and governmental agencies, and other officials within the SBA. To market the OSCS mission and programs she must establish and maintain effective working relationships with these groups, who themselves are not united groups but individuals who must be individually contacted and convinced of the advantages of the mission and programs. She develops the approaches and techniques necessary to convince each potential participant to participate in the OSCS program. Decisions regarding what needs to be done are dependent upon the part each potential participant has to play and what the appellant needs to do to gain agreement or compliance. Many of the approaches and techniques she uses are new in that there are no direct precedents and the appellant must make individual and often on-the-spot judgments on how to approach her contact. This is a match to Level 4-5. The complexity of her position does not meet Level 4-6 which is the level appropriate for positions at the highest level within the agency responsible for developing communication plans and approaches.

Factor 5, Scope and Effect:

Positions credited at Level 5-4 perform work the purpose of which is the development of complete communication plans for an organization, or to develop for program officials advisory, planning and technical services in designing approaches resolving public affairs problems in various program areas. At this level the work contributes to the achievement of program objectives by clarifying the issues and alternatives facing agency managers in achieving a meaningful communication between the agency and the various publics affected by its programs or policies.

At Level 5-5, the purpose of the work is to identify the causes or reasons for public misunderstanding or indifference to agency programs and policies, and to develop alternative communication strategies that enable the agency to establish and maintain mutual understanding with the general public or other specialized publics. The work affects the successful achievement of major programs conducted by the agency and the social and economic well-being of substantial numbers of people included in the groups affected by the continued efficient operation of these programs.

The SBA human resources specialist credited Level 5-5 in its evaluation of the appellant's appeal to the agency. We disagree with their factor evaluation. We find that the scope and effect of the appellant's position is a match to Level 5-4. Consistent with that level her work consists of a complete marketing plan encompassing all facets of information dealing with all of the programs of one field office of a Federal Agency. In order to be credited at the next higher level the work would have to involve the performance of public affairs work, or marketing work in the appellant's case, for the agency at the agency level. As stated at Level 5-5, the appellant does identify "causes or reasons for public misunderstanding or indifference to agency programs and policies" of the SBA at the OSCS level. But she does not develop "alternative communication strategies that enable the agency to establish and maintain mutual understanding with the general

public or other specialized publics.” Her work involves a microcosm of agency publics, but she does not develop communication strategies for the agency as a whole which is the type of work creditable at Level 5-5 of the standard.

Factor 6, Personal Contacts:

Level 6-3 is creditable for positions whose contacts are with specialized groups or individuals from outside the employing organization, where the purpose of each contact is different and the roles and approach are established during the contact. Typical of this level are contacts with representatives of the news media, organized groups, and professional groups. To be creditable at Level 6-4 a position’s personal contacts must be with nationally or internationally known groups or individuals from outside the agency where the contact is not routinely or easily established and each contact is conducted for different reasons and under different circumstances. Typical of these contacts are meetings with nationally known members of the news media, national leaders of civic or trade organizations, State governors, mayors of large cities or high-level county or regional governmental officials.

In order to be credited, this level of personal contacts must also be regular and recurring. That is, they may not be so unique or seldom as to constitute a non-recurring event. The SBA credited Level 6-3 for this factor, but we disagree. We believe that Level 6-4 is appropriate. Our interviews with the appellant and her supervisor indicate that she has frequent meetings with the mayor of [City] or his deputy, state representatives on the Welfare-to-Work program in the eastern [State] area, local directors of national organizations, county authorities, and TV and newspaper reporters. While some of these meetings are scheduled meetings for specific purposes, they just as often are not for routine purposes, are difficult to establish and are for new or different reasons. We believe that this meets the intent of Level 6-4.

Factor 7, Purpose of Contacts:

At Level 7-3 of the classification standard, the purpose of contacts is to analyze, develop and present alternative approaches in developing communication strategies for misunderstood agency policies or programs; or present clarifications of agency activities or policies to specialized groups, representatives of the news media, or individuals. The nature of the appellant’s contacts is a match to this level.

Factor 8, Physical Demands:

The appellant’s position is a match to Level 8-1 which is appropriate for positions where physical demands are minimal or normal for the type of work performed.

Factor 9, Work environment:

The appellant is exposed to a normal range of everyday risks or discomforts during the course of the work. This is a match to Level 9-1.

Factor 1, Knowledge Required by the Position	Level 1-8	1550 pts.
Factor 2, Supervisory Controls	Level 2-4	450 pts.
Factor 3, Guidelines	Level 3-4	450 pts.
Factor 4, Complexity	Level 4-5	325 pts.
Factor 5, Scope and Effect	Level 5-4	225 pts.
Factor 6, Personal Contacts	Level 6-4	110 pts.
Factor 7, Purpose of Contacts	Level 7-3	120 pts.
Factor 8, Physical Effort	Level 8-1	5 pts.
Factor 9, Work Environment	Level 9-1	<u>5 pts.</u>
	Total	3240 pts.

The total of points for the work classified to the GS-1035 standard is 3240 points. This falls into the range of points for credit to the GS-13 level (3155-3600 points). The proper grade for the nonsupervisory work, then, is GS-13.

Supervisory Work

Approximately 25 percent of the appellant's work is involved in supervising the employees assigned to the OSCS. This work is graded by comparison to the General Schedule Supervisory Guide. This standard is expressed in terms of six separate factors. Similar to the FES, there are different levels described that reflect different degrees of difficulty or complexity and each level has a corresponding point value assigned. The total of points is compared to a Point-to-Grade Conversion Chart to determine the grade. Each factor is addressed below.

Factor 1 – Program Scope and Effect:

To be credited at Level 1-2 the program segment or work directed must be administrative, technical, complex clerical or comparable in nature. The functions, activities, or services provided have limited geographic coverage and support most of the activities comprising a typical agency field office, an area office, a small to medium military installation, or comparable activities within agency program segments. At this level the services or products support and significantly affect area office level, or field office operations and objectives, or comparable program segments; or provide services to a moderate, local or limited population of clients or users comparable to a major portion of a small city or rural county.

To meet Level 1-3 the scope must equate to directing a program segment that performs technical, administrative, or professional work. The program segment or work directed typically have coverage encompassing a major metropolitan area, a State, or a small region of several States, or, when most of an area's taxpayers or businesses are covered, coverage comparable to a small city. The activities, functions or services accomplished directly and significantly impact a wide range of agency activities, the work of other agencies, or the operations of outside interests, or the general public.

At Level 1-4 the work involves directing a segment of a professional, highly technical, or complex administrative program which involves the development of major aspects of key agency scientific, medical, legal, administrative, regulatory, policy development or comparable, highly

technical programs. The results of work impact the agency's headquarters operations, several bureau-wide programs, or most of an agency's entire field establishment; or facilitate the agency's accomplishment of its primary mission or programs of national significance; or impact large segments of the Nation's population or segments of one or a few large industries; or receives frequent or continuing congressional or media attention.

There are two parts to this factor – scope and effect. The appellant fully meets Level 1-3 for scope in that the SBA program segment that she directs performs administrative work having coverage encompassing a major metropolitan area and half of a State, conditions described at this level. It does not meet the next higher level because Level 1-4 is appropriate for positions that direct a program segment which involves the development of major aspects of key agency administrative or comparable, highly technical programs. The appellant's OCS is responsible for a portion of those SBA programs that are the mission of the District Office, also in [City]. The appellant's position also meets Level 1-3 for the effect of the program segment supervised. Consistent with that level, her work impacts the work of other agencies, the operations of outside interests (e.g., lenders and volunteer organizations), and the general public in the form of businessmen, entrepreneurs, and potential entrepreneurs. It does not compare favorably to Level 1-4 where the work typically impacts the agency's headquarters operations, several bureau-wide programs, or most of an agency's field establishment, or similar impact. The appellant's position is a match to Level 1-3 for this factor.

Factor 2 – Organizational Setting:

The appellant reports to the District Manager who in turn reports to an SES equivalent. This is a match to Level 2-2.

Factor 3 – Supervisory and Managerial Authority Exercised:

According to the position description and the interview with the appellant, she fully meets the criteria of Level 3-2c of Factor 3. As at that level she assigns work to subordinates, sets their priorities, establishes their performance standards, evaluates their work, provides or arranges for training, provides advice, counsel and instruction to subordinates, hears complaints, etc. Her position does not meet the next higher level, however, because she does not supervise or manage her organization through subordinate supervisors or team leaders as required at that level.

Factor 4 – Personal Contacts. This factor is comprised of two subfactors.

Subfactor 4A – Nature of Contacts:

The appellant meets the highest level for this factor, Level 4A-4. Consistent with that level she has frequent contact with elected and appointed representatives of State and local governments, and with journalists of major metropolitan and regional media outlets.

Subfactor 4B – Purpose of Contacts:

Consistent with Level 4B-3 the purpose of the appellant's contacts is to justify, defend or negotiate in representing the project or program segment in obtaining or committing resources and in gaining compliance with the goals of the OSCS. The position does not meet the next higher level which is to influence, motivate or persuade persons or groups to accept opinions or take actions related to advancing the fundamental goals and objectives of the program or segments directed, when intense opposition or resistance is encountered due to significant organizational or philosophical conflict, competing objectives, major resource limitations or reductions, or comparable issues. Although she does attempt to influence, motivate or persuade persons and groups to take the actions she recommends, these persons or groups are not intensely opposed to OSCS programs, nor are there significant organizational or philosophical conflicts, competing objectives, etc. Level 4B-3 is appropriate for this subfactor.

Factor 5 – Difficulty of Typical Work Directed:

The work which best characterizes the nature of the nonsupervisory work of the organization and constitutes at least 25 percent of the workload of the organization is GS-12. This equates to Level 5-7.

Factor 6 – Other Conditions:

At Level 6-4 supervision requires substantial coordination and integration of a number of major work assignments, projects, or program segments of professional or administrative work comparable in difficulty to the GS-11 level. Typical of work at this level, for example, is exercising leadership in developing, implementing, evaluating, and improving processes and procedures to monitor the effectiveness, efficiency, and productivity of the program segment and/or organization directed.

Supervision and oversight at Level 6-5 requires significant and extensive coordination and integration of a number of important projects or program segments of professional, managerial, or administrative work comparable in difficulty to the GS-12 level. Supervision at this level involves major recommendations that have a direct and substantial effect on the organization and projects managed. Following this level definition, the standard requires that in order for a position to be credited at this level it must make recommendations in three of the following seven areas listed below, or in comparable areas:

- Significant internal and external program and policy issues affecting the overall organization, such as those involving political, social, technological, and economic conditions, as well as those factors cited in the first item of Factor Level 6-4a;
- Restructuring, reorienting, recasting immediate and long range goals, objectives, plans, and schedules to meet substantial changes in legislation, program authority, and/or funding;

- Determinations of projects or program segments to be initiated, dropped, or curtailed;
- Changes in organizational structure, including the particular changes to be effected;
- The optimum mix of reduced operating costs and assurance of program effectiveness, including introduction of labor saving devices, automated process, methods improvements, and similar;
- The resources to devote to particular programs (especially) when staff-years and a significant portion of an organization's budget are involved);
- Policy formulation, and long range planning in connection with prospective changes in functions and programs.

The appellant fully meets Level 6-4, and at first glance appears to meet the narrative description of Level 6-5 for this factor. However, there is no evidence in the position description or in the interviews conducted with the appellant and her supervisor that she is responsible for making recommendations in any of the above seven areas or comparable areas. The position is credited at Level 6-4 for this factor.

The six factors and points assigned are as follows:

Factor 1, Program Scope and Effect	Level 1-3	550 points
Factor 2, Organizational Setting	Level 2-2	250 points
Factor 3, Supv and Mgr Authority Exercised	Level 3-2c	450 points
Factor 4, Personal Contacts		
Subfactor 4A, Nature of Contacts	Level 4A-4	100 points
Subfactor 4B, Purpose of Contacts	Level 4B-3	100 points
Factor 5, Difficulty of Typical Work Directed	Level 5-7	930 points
Factor 6, Other Conditions	Level 6-4a	<u>1120 points</u>
	TOTAL	3500 points

The total of points assigned for the supervisory work performed by the appellant is 3500. This falls into the range for grading the work GS-13 (3155-3600).

Decision

The final classification of the appellant's position is Supervisory Economic Development Specialist, GS-1101-13.