U.S. Office of Personnel Management Classification Appeal Decision Under section 5112 of title 5, United States Code

Appellant:	[Appellant]
Agency classification:	Public Affairs Specialist GS-1035-11
Organization:	[Organization] [Organization] Bureau of Land Management U.S. Department of the Interior [City, State]
OPM decision:	Public Affairs Specialist GS-1035-11
OPM decision number:	C-1035-11-04

//Judith A. Davis for

Robert D. Hendler Classification and Pay Claims Program Manager Merit System Audit and Compliance

3/7/2012

Date

As provided in section 511.612 of title 5, Code of Federal Regulations (CFR), this decision constitutes a certificate which 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 (Introduction*), appendix 4, Section G (address provided in appendix 4, section H).

Decision sent to:

[Appellant] [Address] [Location]

[Name Field Manager [Address] [Location]

[Name] Acting Human Resources Officer [Address] [Location]

Director of Human Resources U.S. Department of Interior Mail Stop 5230-MIB 1849 C Street, NW. Washington, DC 20240

Introduction

On July 29, 2011, Chicago Oversight of the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from [appellant]. Her position is currently classified as a Public Affairs Specialist, GS-1035-11, but she believes her duties and responsibilities warrant upgrading her position to the GS-12 grade level. The appellant works in the [region] States Field Office, [region] States State Office, Bureau of Land Management (BLM), U.S. Department of the Interior (DOI), in [City, State]. We received the agency administrative report (AAR) on August 19, 2011, and final comments from the appellant on August 26, 2011. We accepted and decided this appeal under section 5112(b) of title 5, United States Code (U.S.C.).

Background

The [region] States Field Office originally had two public affairs specialists, one working primarily with the [program] and the other position, occupied by the appellant, handling public affairs related to the [program], a public program dealing with recreation on public lands. After the retirement of the Public Affairs Specialist handling the [program], management made the decision to combine the two positions into one as the [program] no longer required significant work in the public affairs area due to website developments in the program. The combined position encompassed all of the public affairs duties related to the [region] States Field Office including the [program], resulting in the current public affairs specialist position held by the appellant.

The appellant originally occupied position description (PD) number [XXXXXX], classified as Public Affairs Specialist, GS-1035-11, on December 12, 2002. The previous supervisor of the position rewrote the PD to reflect the current duties and responsibilities being carried out in the position. The rewritten PD was classified as Public Affairs Specialist, GS-1035-11, on January 8, 2010, PD number [XXXXXX], and the appellant was reassigned to the rewritten PD. The appellant filed an appeal with DOI on October 12, 2010, stating the duties of the position warranted classification as GS-1035-12. On May 9, 2011, the appeal decision was finalized to uphold the classification of the position as Public Affairs Specialist, GS-1035-11.

The AAR included the appellant's current SF-50 listing PD number [XXXXXXX] as the PD of record; however, the appellant and current supervisor of the position stated the correct PD was PD number [XXXXXXX], which was rewritten to accurately reflect the current duties and responsibilities of the position. Upon discussion with the servicing HR office, it was discovered that the appellant had never been officially reassigned to the new PD. This error was corrected and an updated SF-50 provided, documenting the PD of record as PD number [XXXXXX].

General issues

The appellant compares her duties to a similar but higher graded position assigned to the [region] States Field Office to support her request that her position be upgraded. In adjudicating this appeal, our responsibility is to make our own independent decision on the proper classification of the position. By law, we must make that decision solely by comparing the appellant's current duties and responsibilities to OPM position classification standards (PCS) and guidelines (5

U.S.C. 5106, 5107, and 5112). Since comparison to OPM standards and guidelines is the exclusive method for classifying positions, we cannot compare the appellant's current duties to other positions which may or may not be classified properly as a basis for deciding her appeal.

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. If the appellant considers her position so similar to others that they all warrant the same classification, she may pursue the matter by writing to her agency's human resources headquarters. In doing so, she should specify the precise organizational location, classification, duties, and responsibilities of the positions in question. If the positions are found to be basically the same as hers, the agency must correct their classification to be consistent with this appeal decision. Otherwise, the agency should explain to her the differences between her position and the others.

Position information

The appellant reports to the Associate Field Manager and Field Manager for the BLM [region] States Field Office, referred to as the Field Office. The [region] States Field Office reports to the BLM [region] States Office, referred to as the State Office, which includes a public affairs office, the Office of External Affairs. The [region] States Office reports directly to BLM Headquarters in Washington D.C., which in turn reports to DOI.

The appellant serves as the public affairs specialist for the [region] State region, responsible for providing public affairs support and counsel to all management team members and staff. This includes proposing methods of securing public awareness and involvement, including media contact, news releases, articles, briefings, speeches, publications, audio-visual presentations, public meetings, and responses to public inquiries. She also develops public involvement strategies for field office activities to provide for information exchange between BLM and the public; develops and maintains professional relations with local media; promotes environmental education and interpretive activities; oversees the preparation of publications and visual products; ensures public affairs are an integral part of programs; and develops and transmits informational materials to the general public and affected agencies, groups, and individuals to enhance understanding of the region's programs and work activities.

The appellant also serves as the Field Office's Special Emphasis Black Employment Manager acting as a liaison for the State Office with diversity colleges/universities and organizations, coordinating the participation of the State Office in diversity recruitment events such as career fairs or college visits, participating as a representative of the State Office at career fairs, and giving presentations at local colleges/universities regarding seasonal employment. These duties occupy about 25 percent of her work time. Additional duties performed as necessary include acting as the Fire Information Officer and grant writer.

Series, title, and standard determination

The agency has classified the position in the Public Affairs Series, GS-1035, titling it Public Affairs Specialist, and determined it is properly evaluated by application of the GS-1035 PCS. The appellant does not disagree. Based on careful review of the record, we concur with these determinations. Because the appellant's special emphasis program duties are an aspect of her primary public outreach and information distribution duties, we have considered them in our application of the GS-1035 PCS.

Grade determination

The GS-1035 PCS is written in the Factor Evaluation System (FES) format, under which factor levels and accompanying point values are to be assigned for each of the following nine factors, with the total then being converted to a grade level by use of the grade conversion table provided in the standard. The factor point values mark the lower end of the ranges for the indicated factor levels. For a position to warrant a given point value, it must be fully equivalent to the overall intent of the selected factor level description. If the position fails in any significant aspect to meet a particular factor level description, the point value for the next lower factor level must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level.

Factor 1, Knowledge Required by the Position

This factor measures the nature and extent of information an employee must understand in order to perform the work, and the skills needed to apply that knowledge.

At Level 1-7, work requires knowledge applicable to a wide range of duties involving oral and written communication; skill in modifying standard methods and approaches in developing new information materials to enhance the understanding of groups or individuals on significant agency issues; and skill in assessing public reaction, identifying the extent of understanding achieved, and explaining significant issues to generally responsive groups or individuals interested in the agency's programs. Examples of assignments provided by the standard to illustrate this level of knowledge are:

Knowledge and skill sufficient for conducting workshops, seminars, and other meetings with non-profit organizations, schools, State and local government agencies and cooperating industries to stimulate interest in such efforts with constituents of their groups.

Knowledge and skill sufficient for providing representatives of the print and broadcast media, trade associations, and industrial representatives with timely and accurate explanations of agency policies and regulations.

The knowledge required by the position meets Level 1-7. The work requires use of a variety of communication techniques to develop and maintain professional relations with media in a [number]- state jurisdiction, explain the agency's position to individuals and groups that may contain individuals having opposing viewpoints, and write news releases, feature stories, public service announcements, and speeches. The appellant develops and transmits informational

materials to enhance the understanding of bureau programs and work activities. The appellant is heavily involved in public affairs for BLM's [program] throughout the jurisdiction area. At these adoptions, the appellant is occasionally met with sensitive topics regarding the agency's methods for gathering animals from the wild. The appellant must be able to assess the responsiveness of the group or individual to the discussion concerning these controversial topics in order to properly address the question in an attempt to clarify misunderstandings while explaining the reasoning and necessity of the agency's actions. The appellant is also responsible for assessing public reaction to various events to advise management of possible modifications to make future events more successful.

At Level 1-8, the work requires mastery of communication principles and techniques; skill in developing and applying new approaches to the most difficult and complex public affairs problems by developing or evaluating information programs to enhance understanding among publics opposed to or indifferent to agency programs; skill in analyzing public reaction to agency programs and policies in developing recommendations that significantly modify an agency's major programs or policies; and skill in integrating diverse points of view in a communication plan to establish and maintain mutual understanding with various agency publics. Examples of assignments provided by the standard to illustrate this level of knowledge are:

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.

Knowledge and skill sufficient for analyzing conflicting data and summarizing recommendations or program changes giving consideration to various points of view and specifying the reasons for acceptance or rejection of the input.

The appellant believes her work in the [program], which requires planning and carrying out adoptions in various locations throughout the assigned [number]-state jurisdiction area, meets Level 1-8. She explained that due to the diversity of geographic areas and communities throughout the jurisdiction area, she must analyze, research, and interpret different media outlets in order to properly publicize adoptions to ensure the success of each adoption and the overall program for her assigned area. She states that many events are in rural areas requiring her to change the normal approach for publicizing the adoption by applying different theories based on her interpretation of the surrounding geographic area and the citizens of that area, such as rural farm areas surrounding the adoption site.

While the [program] requires the appellant to research and analyze various geographic areas and communities in developing plans to promote each adoption, the knowledge required does not meet Level 1-8 as it does not require the incumbent to analyze public reaction to agency programs and policies to develop recommendations that significantly modify the agency's major programs or policies. Instead, as at Level 1-7, the appellant advises field management on modifications to the methods utilized in carrying out agency programs or policies, such as the appropriateness of a location for a [program] adoption site due to past experience with the program. These are not major program or policy modifications as described at Level 1-8. Any

major adjustments to programs and/or policies would be handled at the bureau or department levels. Additionally, when difficult and complex public affairs problems arise throughout the agency, the bureau or department public affairs offices distribute memorandums or bulletins explaining the issue and the agency's stance on the issue. As described above, this position encounters sensitive topics while interacting with the public such as the agency's method of animal collection for [program] adoptions; however, this is a recurring issue in which information concerning the agency's stance on the topic has been developed by the bureau public affairs office.

Level 1-7 is credited (1250 points).

Factor 2, Supervisory Controls

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work.

At Level 2-4, the supervisor determines the overall objectives and resources available to perform the work. The employee and supervisor jointly develop deadlines, projects, and the nature of planned assignments. The employee is responsible for planning and carrying out the assignments, resolving most problems, coordinating the work with others, interpreting policy, and determining approach and the methods and techniques to be employed. The employee keeps the supervisor informed of progress, potential controversies, or wide-ranging implications. Completed work is reviewed in terms of achieving expected results, responsiveness, and conformance with agency policy, and may also be subject to clearance procedures from higher levels in the agency.

The supervisory controls for this position meet Level 2-4. The appellant has considerable latitude for initiative and innovation in the Field Office public affairs plans, with major plans being reviewed by the Field Manager and other key field staff as appropriate. The incumbent has full responsibility for scheduling work to meet deadlines and objectives and completing assignments, but confers with superiors on controversial, precedent-setting, or major policy matters to determine appropriate course of action. For example, the Field Manager approves a schedule for the [program] listing the sites and dates of the adoptions; it is the appellant's responsibility to independently coordinate all public affairs for these events.

At Level 2-5, the supervisor provides administrative direction by making assignments in terms of the broadly defined mission of the organization's public affairs program. The employee is responsible for independently planning, designing, and carrying out the major program functions, informing the supervisor of progress as appropriate. Results achieved are considered technically authoritative and are normally accepted without significant change. Particularly sensitive or controversial issues may be reviewed at the headquarters level. Recommendations for new projects and shifts in program objectives are evaluated in terms of resources available, program goals, or agency-wide priorities.

The appellant states that her work meets Level 2-5 as it is planned, designed, and carried out independently and normally accepted without significant changes. She provided examples of her

work carrying out the [program], stating she is responsible for coordinating all aspects of the adoptions as lead for her Field Office. The appellant states her supervisor provides direction with assigned adoptions broadly in conjunction with BLM's mission. She further states she independently studies the local area of the adoption to develop marketing plans, requests marketing funds from the Washington Office, and follows specific deadlines/timeframes that are established for each adoption. Additionally, the appellant states that in her role as the Field Office's Black Employment Manager she advises management of programs or activities the office may participate in, such as [state's] Diversity Career Day, to promote the seasonal internship program.

Level 2-5 recognizes not only independence of action, but also a higher degree of responsibility and authority as the context for the independence exercised. This level describes responsibility to independently plan, design, and carry out a significant program or function, with only broad administrative and policy direction. While the appellant independently carries out operational activities in the field office, as described by the appellant in her work with the [program] and in diversity recruitment, the boundaries are defined by the Field Manager, the Office of External Affairs, as well as higher public affairs offices at the bureau and department levels. Regardless of the level of independence, the nature of the work is not such that it would permit the exercise of this level of responsibility and authority, which is properly credited to the head of a program or function.

Level 2-4 is credited (450 points).

Factor 3, Guidelines

This factor covers the nature of the guidelines used and the judgment needed to apply them. The standard instructs that the existence of specific procedures and policies may limit the opportunity of the public affairs specialist in making or recommending decisions or actions, and thus may affect the factor level assignment.

At Level 3-3, guidelines include operating instructions, public affairs manuals, agency policies and regulations, and standard agency public affairs practices and precedents. The employee must independently select, interpret, and apply these guidelines, modifying and adapting them to suit specific situations.

The guidelines used by the appellant meet Level 3-3. The appellant utilizes bureau and department manuals, policies, instruction memos, and accepted practices for external affairs as guidelines. The guidelines are not completely sufficient for dealing with some of the more complex situations the appellant encounters requiring her to adapt them to the situation at hand. The appellant is responsible for interpreting bureau policies in an impromptu manner for various news media and must apply judgment in interpreting guidelines, adopting them, and developing new approaches.

At Level 3-4, guidelines are agency policy statements or broad precedents that are applicable in establishing general program direction, but not totally sufficient for dealing specifically with the more complex or unusual problems encountered on a recurring basis. The employee must

deviate from standard procedures 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 agency publics is essential to the success of the agency mission. The appellant states her work meets this level by developing new approaches to publicize horse and burro adoptions, such as coordinating advertisements with various statewide equine events. She also states that due to each adoption site being in a different location, with many differences to consider, the use of her judgment and interpretation is extremely important in developing a marketing plan to reach the public in specific adoption locations.

While the appellant must adapt guidelines to fit situations encountered, such as the various marketing methods used to reach a variety of audiences in numerous geographic areas in carrying out the responsibilities of the [program], the position does not meet Level 3-4. Level 3-4 applies when agency policy and broad precedents establish only a general program direction. Unlike Level 3-4, in the appellant's case guidelines from the bureau and the department guide public relations in the field offices. While the guidelines do not specifically address all situations encountered, they are more specific than agency policy statements or broad precedents. Informational memoranda and bulletins issued by the bureau and department public affairs offices instruct the field offices on the agency stance for controversial issues and at times outline who may address questions concerning the topic, such as only Field Managers or above. While some latitude is given on how to approach the subjects when relaying information, the overall direction and outcome of the issue is explained. This precludes crediting Level 3-4 to the appellant's position.

Level 3-3 is credited (275 points).

Factor 4, Complexity

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

At Level 4-4, the work requires the application of advanced communication and analytical practices and techniques to the solution of complex public affairs problems, such as developing and presenting informational material to achieve understanding of various points of view or concepts from publics with varying levels of understanding and different interests and perspectives on the subjects; employing a number of information gathering techniques in collecting and analyzing public reaction to information programs; and developing information for management in improving the agency's communication with the general public and specialized groups.

The complexity of the position meets Level 4-4. As the advisor in public affairs to the Field Manager, the appellant must possesses a thorough understanding of particularly sensitive and visual issues, such as: law enforcement, hazardous materials, and realty actions that require the incumbent to analyze and interpret policies, issues, and programs in order to present them appropriately to individuals and groups who may lack understanding or have indifferent or opposing points of view. Differences in regulations, policies, and programs, as well as the local

and national environment, cultural, and economic impacts of issues, often demand the appellant develop new techniques to communicate with various audiences. For example, the incumbent is currently working in coordination with the Office of External Affairs, field management, and natural resources specialists in the development of a communication plan regarding the lease of Federal land to a coal mining operation. This topic is of interest to various members of the public, such as individuals who would benefit from mining jobs, the mining company profiting from operations, and citizens who utilize the area for recreational purposes. Typical of Level 4-4, the communication plan for this topic must address all audiences involved.

At Level 4-5, the work includes the development of new methods, strategies, and communication plans covering the complete spectrum of the organization's program. Decisions regarding what needs to be done include evaluating the appropriateness of existing strategies and plans. 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.

The appellant believes her work developing design and input specifications and compiling data regarding the accomplishments of her Field Office for use in the [region] States Annual Report meets Level 4-5. She states that in her work she considers factors such as unusual local conditions, increased emphasis on energy conservation, and the relationship of problems and practices related to public affairs. When making decisions, she states she is often required to depart from past approaches, developing new techniques to meet objectives without compromising public affairs techniques and principles. An example the appellant provided was how she incorporates the increased emphasis on energy conservation when planning for events, such as National Public Lands Day, Earth Day, and public meetings regarding oil and gas resources. She explained that she provides information and resource materials needed to address BLM's best practices on energy conservation. The provided materials include resource books, publications, brochures, and handouts to help inform and educate participants.

While the appellant provides information to communicate to the public the agency's stance on environmental topics and various agency programs, this work does not meet Level 4-5. Level 4-5 entails developing communication plans covering the complete spectrum of the organization's program. These functions are performed in the bureau and department public affairs offices which are responsible for overall development of communication methods and strategies for the organization that are followed by the field offices. Field offices must refine the methods and practices to fit the particular communication needs of their respective areas, such as in the example provided by the appellant in preparing for public meetings and events, but do not develop new methods, strategies, and communication plans covering the complete spectrum of the organization's program.

Level 4-4 is credited (225 points).

Factor 5, Scope and Effect

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

At Level 5-3, the work involves performing duties of a recurring nature in dealing with precedented public affairs matters, such as responding to media questions on standard agency policies, explaining the benefits of programs to interested groups, or developing parts of a communication plan. The work affects the development or operation of the organization's communication plan or impacts the social or economic well-being of individuals served or affected by agency programs or policies.

The scope and effect of the position meet Level 5-3. The position is responsible for handling public affairs matters following bureau and agency precedent, such as conducting outreach and public affairs for the yearly recurring horse and burro adoptions, addressing questions regarding the collection of [animals], and speaking with the public and media concerning topics of public meetings held to answer questions and inform the public of various activities that may have an effect on the citizens and/or surrounding community. Typical of Level 5-3, the appellant confers with management when addressing topics that are controversial, precedent setting, or regarding major policy matters to determine the appropriate course of action. Like Level 5-3, the appellant is responsible for advising management on potential public reaction to policies and activities and for preparing communication material appropriate to assist the public and media understand programs.

At Level 5-4, the purpose of the work is the development of complete communication plans for an organization and provision to program officials of advisory, planning, and technical services in designing approaches resolving public affairs problems in various program areas. The work contributes to the achievement of program objectives by clarifying the issues and alternatives facing agency managers in achieving meaningful communication between the agency and the various publics affected by its programs or policies. The appellant states her work in meeting BLM's mission and goals through the [program], which affects a large number of people throughout her assigned [number]-state jurisdiction, meets Level 5-5. She further states that she must develop marketing budgets each year unique to the various locations each adoption is held.

While the appellant's work in the [program] assists the agency in meeting its overall program objectives, the position does not develop complete communication plans to address public affairs problems for program areas as described at Level 5-4. Unlike Level 5-4, the appellant assists in developing communication plans for controversial topics by working with program managers, supervisors, and managers in coordination with the Office of External Affairs. In most instances, unless required by law or regulation, a communication plan is not developed unless the topic is controversial in nature or safety issues are involved, such as when a prescribed burn is going to be conducted by the fire program. Communication plans, such as the fire information plan, are developed by the field specialists, such as natural resources specialists, and the appellant provides advice and review of the final plan before it is referred to the Field Manager for approval. Since the appellant's position fails to meet Level 5-4, the crediting of Level 5-5 is precluded and will not be addressed further.

Level 5-3 is credited (150 points).

Factor 6, Personal Contacts

This factor includes face-to-face contacts and telephone and radio dialogue with persons not in the supervisory chain. The relationship of Factors 6 and 7 presumes that the same contacts will be evaluated under both factors.

At Level 6-3, contacts are with representatives of the news media or with professional and/or trade organizations where the contacts are not routinely established; or with management officials within the agency where the employee is serving in a consulting capacity on sensitive or controversial issues, and there is difficulty in encouraging the managers to adopt recommendations.

The appellant's personal contacts meet Level 6-3. Contacts include members of the news media organizations, local, regional, and national community and special interest groups, and State, county, and private organizations which have interest in the Field Office and BLM programs. The appellant also contacts congressional staff members, BLM State and Washington office staff, county officials, local and regional politicians, trade associations, education institutions and others interested in resource management in order to share ideas and advance programs of mutual interest.

At Level 6-4, contacts are 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 government officials. The claimant states she has face-to-face and telephone contacts with such people.

While the appellant has various congressional and political contacts, the nature of these contacts is to provide scheduled dates and times on upcoming agency programs and activities, such as the [program], or to set up meetings between the congressional office and the Field Manager or other members of management. These contacts do not reflect the setting, the efforts required, or difficulty of communications described at Level 6-4, where the contact is not routinely or easily established and each contact is conducted for different reasons and under different circumstances. Any contacts of this nature at a national or similarly high level would be handled by the management team or the bureau or department public affairs offices. Therefore, this position does not meet the requirements of Level 6-4.

Level 6-3 is credited (60 points).

Factor 7, Purpose of Contacts

This factor covers the purpose of personal contacts which range from factual exchange of information to situations involving significant or controversial issues and differing viewpoints, goals, or objectives.

At Level 7-3, the purpose of the contacts is to analyze, develop, and present alternative approaches to, or clarifications on, communication strategies for misunderstood agency policies or programs.

The purpose of the appellant's contacts meets Level 7-3. Her contacts are for the purposes of providing information exchange to encourage an understanding of policies and practices, enhance public support and participation, help resolve conflicts, and gain an understanding and appreciation of the various viewpoints involved in a particular issue. The appellant is involved in coordinating and executing meetings with the public to discuss topics affecting the public. The appellant works alongside management in explaining the topic and answering questions from the general public. Explanation and clarification of policies and activities may be presented to media representatives as well, who may at times be critical or skeptical of the information.

At Level 7-4, the purpose of contacts is to explain, relate, and defend significant or controversial agency actions or decisions affecting the basic principles of an agency's program; mediate among groups or individuals with divergent viewpoints regarding alterations to programs; or convincing agency program managers to change or modify decisions on controversial issues to avoid public misunderstanding of programs or policies. The appellant states that her contacts within the Field Office jurisdiction area to ensure a working relationship, promote programs, arrange for the exchange of information, and negotiate with media outlets on the purchase of advertisements meet this level.

The purposes of the appellant's contacts are not to defend significant or controversial agency actions or decisions, nor convince agency program mangers to make changes or modify decisions involving significant or controversial issues regarding agency programs or policies, as defined at Level 7-4. Contacts of this level would be properly credited to the bureau or department public affairs offices.

Level 7-3 is credited (120 points).

Factor 8, Physical Demands

This factor covers the requirements and physical demands placed upon the public affairs specialist by the work assignment.

At Level 8-1, work is primarily sedentary and performed at a desk, but may include occasional brief visits to worksites requiring exposure to elements encountered in industrial or outdoor work sites. No special physical demands are involved in performing the work at this level.

At Level 8-2, work requires regular and recurring physical exertion, or long visits to outdoor or industrial sites resulting in exposure to elements such as inclement weather or movement over rough or uneven surfaces. The work requires common physical characteristics such as above average resistance to fatigue. The appellant states that her work meets this level as it requires physical exertion approximately 60 percent of the time with such tasks as walking over rough and uneven terrain, lifting and carrying items such as exhibit cases and laptops, and bending, reaching, and lifting.

While the appellant is required to occasionally work in an outdoor environment, overall the work of this position is in an office setting and does not meet Level 8-2. For each adoption associated with the [program], the appellant must travel to the adoption site to conduct interviews with local media prior to the event and provide information to the public during the adoption. Media interviews are typically conducted Monday through Friday in an office setting. The adoption is conducted on Friday and Saturday, in an outdoor environment such as a stock yard, where the incumbent is exposed to animals, equipment, and at times inclement weather. During the past year, the appellant conducted 12 adoptions. Based on two days in an outdoor environment for each adoption, we conclude the appellant would spend a total of 24 days, or approximately 9 percent of a typical work year, in an outdoor environment. Level 8-1 allows for occasional visits to an outdoor environment, similar to those encountered during the [animal] adoptions. While the appellant is required to lift various items, such as laptops, exhibit cases, and packets of resource materials, these are items typically encountered in an office environment that do not require above average physical exertion as explained in Level 8-2. Thus, we conclude the appellant's work fails to meet Level 8-2.

Level 8-1 is credited (5 points).

Factor 9, Work Environment

This factor considers the risks and discomforts that may be imposed upon public affairs specialists by various physical surroundings or job situations and the safety regulations required.

At Level 9-1, the work environment involves everyday risks or discomforts requiring normal safety precautions typical of office settings. Work areas are adequately lighted, heated, and ventilated.

At Level 9-2, the work environment includes regular and recurring exposure to moderate risks, discomfort, or unpleasant surroundings. The appellant states her work environment meets this level due to large amounts of travel and work performed in an outdoor setting when conducting [animal] adoptions. She explains that she works around shelters and enclosed buildings that are dusty and muddy, around equipment used to setup adoptions and transport animals, and in all weather conditions.

The work environment for this position is typically in an office or indoor setting, such as a television station or newspaper office, encompassing everyday risks or discomforts associated with an office environment. In carrying out duties related to the [program], the work environment is outdoors in stockyards and fairground areas with exposure to moderate risks, discomfort, or unpleasant surroundings as described by the appellant. However, as previously discussed, this only occurs approximately 24 days per work year. Thus, this work is not regular and recurring for a sufficient amount of the appellant's work time as defined in the position classification process to permit crediting Level 9-2.

Level 9-1 is credited (5 points).

Summary

Factors	Level	Points
1. Knowledge Required by the Position	1-7	1250
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	6-3	60
7. Purpose of Contacts	7-3	120
8. Physical Demands	8-1	5
9. Work Environment	9-1	5
Total Points		2540

The total of 2540 points falls within the GS-11 grade level point range (2355-2750 points) on the grade conversion table in the JFS.

Decision

The appellant's position is properly classified as Public Affairs Specialist, GS-1035-11.