



## United States Office of Personnel Management

**Office of Merit Systems Oversight and Effectiveness**  
*Digest of Significant Classification Decisions and Opinions*  
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**Standard:** [Equal Employment Opportunity Series, GS-0260](#) (November 1980)  
**Factor:** Factor I, Knowledge Required by the Position  
**Issue:** Whether dealing with "systemic problems" requires evaluation at Level 1-8

### **Identification of the Classification Issue**

This issue arose in an Office of Personnel Management region's processing of a classification appeal submitted by an Equal Employment Manager, GS-0260-12. The agency and the appellant agreed on all factors except Factor 1, Knowledge Required by the Position. The appellant believed that she met Level 1-8 because she was concerned with systemic problems as well as case-oriented problems, and systemic problems are not explicitly mentioned in Factor 1 descriptions until Level 1-8. The Office of Personnel Management had to decide whether dealing with systemic problems required evaluation of the position at Level 1-8.

### **Resolution**

The Office of Personnel Management found that the resolution of systemic problems, in and of itself, did not necessarily mean that Level 1-8 was met. Indeed, Benchmark GS-0260-12-01 provides evidence that dealing with systemic problems can be found in a position where Factor 1 is properly evaluated at Level 1-7. In this example, Factor 1 states that the equal employment manager develops staff recommendations to management on management actions, employment practices, and conditions that constitute barriers to equal employment opportunity. Factor 3 of this benchmark position makes it clear that the reference is to defining systemic barriers to equal employment opportunity and the development of local actions to eliminate them. Factor 4 explicitly states that the equal employment manager plans, directs, and systematically evaluates the equal employment opportunity program which is oriented toward identifying the underlying causes of equal employment opportunity problems as well as resolving complaints and solving day-to-day problems. Factor 5 also specifies that the equal employment manager makes

recommendations to solve systemic equal employment opportunity problems. Accordingly, the position described in this benchmark is clearly involved in dealing with systemic problems and is credited at Level 1-7.

The difference between Level 1-7 and Level 1-8 in terms of dealing with systemic problems lies not only in the breadth of the program but also in the manner in which the manager deals with such problems. The Office of Personnel Management found that most of the appellant's efforts to deal with the underrepresentation problem were case oriented (e.g., reviewing recruitment actions as they were received and rewriting SF-171's). The examples provided by the appellant of efforts to deal with problems in a systematic fashion (e.g., a change to the merit promotion plan and reviewing hiring plans) did not display the depth typical of Level 1-8 where the program staff becomes deeply involved in technical personnel administration or management issues. Further, the appellant did not regularly attempt to identify and solve systemic problems through onsite organization reviews by participation in agency management audits or personnel management evaluations as described at Level 1-8. The appellant's EEO program interacted with personnel management functions such as staffing and training but not with the others described at Level 1-8, i.e., labor relations, compensation, and position classification or with other management functions such as budgeting and planning.

The Office of Personnel Management found the knowledge requirements of the appellant's position to be consistent with Level 1-7 where the manager applies managerial and technical EEO knowledges to direct a complete EEO program. More particularly, the appellant's work situation and duties were similar to those of the GS-12 benchmark manager who defines EEO problem areas, identifies reasons for problems, and drafts specific action items to treat the causes of the problems. The GS-12 benchmark manager analyzes management practices, organizational structures, employment patterns, and lines of progression to determine their impact on EEO and upward mobility. These duties and others in the benchmark were found to be similar to those carried out by the appellant and required the type of knowledge described at Level 1-7. The appellant's position lacked the type of in-depth efforts to identify and solve EEO problems as described at Level 1-8.