Identification of the Classification Issue

This issue arose in an OPM oversight division's response to a request for technical guidance. An agency personnelist requested advice on how to use staff years of work performed by seasonal employees to decide if a full-time permanent GS employee’s position could be classified as a work leader. In this situation, the permanent GS employee “led” only seasonal employees. There were no permanent employees assigned to the unit. Four seasonal employees worked during the summer and two in the winter. Each seasonal employee worked 1,040 hours a year. The agency personnelist asked if staff years could be used to determine full-time equivalency for purposes of determining if a position meets the coverage criteria of the GSLGEG. Part I. In this case, the total number of work hours for the six seasonal employees could be calculated as the equivalent of three full-time positions (6,240 total seasonal hours ÷ 2,087 hours in a work year = 2.99 staff years).

Resolution

As affirmed in discussions with OPM’s Classification Programs Division, hours-of-work calculations are not to be used to equate less-than-full-time employees, e.g., seasonal employees, to full-time equivalency for purposes of determining if a position meets the coverage criteria of the GSLGEG. Part I does not specifically state that seasonal employees are not to be considered in such cases. The intent, however, is that a work leader must spend 25 percent or more of his or her work time leading three or more full-time employees on a regular and recurring basis. This is because GSLGEG criteria are intended to evaluate the difficulty and responsibility of executing a broad range of leader duties performed over a continuing group of employees. Further, if counting hours of work were permitted for coverage determinations, an agency might find itself in
the position of having to consider overtime hours in its staff-year calculations to determine full-time equivalency when such additional hours of work do not add materially to the difficulty and complexity of leader work. Therefore, while leading less-than-full-time employees may be considered in evaluating leader work, that work may not be considered in determining basic GSLGEG coverage.