



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: [Housing Management Series, GS-1173](#) (September 1981)
Factor: Factors 2, 3, and 5
Issue: Evaluating Program Responsibility, Technical Authority, and Program Impact

Identification of the Classification Issue

These issues arose in an OPM oversight division's adjudication of a classification appeal. The appellant was a military base housing manager responsible for a housing management program. His responsibilities included on-base military housing for families; quarters for unaccompanied personnel; mobile home lots; and associated utilities, streets, roads, and grounds. The appellant claimed that his position was a close match to Benchmark 12-1 of the GS-1173 PCS.

The appellant stated that he was the installation's technical expert on housing matters policies, methods and processes and independently carried out the program responsibilities with a minimum of supervision. He, therefore, believed that the supervisory controls of the position should be evaluated at Level 2-5. The appellant claimed that procedures he developed locally were implemented in the departmental operating guidance and, therefore, met the broad management planning and program development criteria discussed at Level 3-4. The appellant also believed that because the program serviced a nearby activity, Level 5-4 should be credited.

Resolution

OPM found that the appellant's level of responsibility did not fully meet the intent of Level 2-5. Level 2-5 discusses national priorities, broad program goals and missions, and the effect of advice and influence on the overall program. At this level, an employee is considered technically authoritative and independently plans and carries out a program with only administrative supervision. Such level of responsibility, however, cannot be viewed in isolation but must be

considered within the context of the significance of the program or function and how much control is really left to the employee's discretion.

In this case, although the appellant worked independently and was considered the technical expert on housing matters for the installation, his assignments consisted of more than broadly defined mission statements. The appellant conducted his program within the policies, objectives, and procedures clearly established by the military Department for administering their housing program. Overall departmental facilities policy was established by a separate engineering command, which had responsibility for approving any policy changes and providing advice.

OPM also found that the supervisor's position was credited with exercising technical control over the appellant's position, and was ultimately held responsible for administration of the housing program (see Digest No.7, page 5). The appellant's organizational context fell substantially short of Benchmark 12-1 in that responsibility for major housing initiatives and other long range program changes were retained by the Department's engineering command. OPM found that Level 2-4 fully recognized the level of expertise, independence, policy interpretation, and program responsibilities typical of the appellant's position.

Regarding guidelines, OPM found that the appellant worked within a number of published regulations including Department policy and program guides and engineering command level requirements. He stated that many issues that came up affected every housing manager and he and other managers shared their solutions to particular problems. He also stated that he shared local procedures, which he developed to address specific situations, with the command level which were adopted into published operating procedures.

OPM found that the presence of an intervening command level organization that furnished some interpretation of broad policy directives prevented the appellant from being in the position of independently interpreting and developing new policy. The purpose of the command program was, in part, to establish consistent approaches to deal with the broad planning issues and housing trends found at Level 3-4. In a related appeal case, another oversight division found that the engineering command's guidance on Public-Private Venture Program initiatives precluded that activity-level housing manager position from being credited with making the *significant* interpretations and adaptations of guidelines intended at Level 3-4. While the guidelines did not address many of the day-to-day problems that occurred, they did permit a sufficient degree of flexibility for adaptation and interpretation to resolve problems typically encountered by many housing managers at the installation level. The degree of guidance the appellant was provided was more appropriately credited at Level 3-3 which adequately recognized the appellant's contribution to policy changes and procedural guidance through his comments on draft proposals and his recommendations for adopting certain procedures for handling situations common to all housing managers.

OPM also found that the primary purpose of the work was the administration, control, and management of housing related operations and activities involving facilities located at the primary

installation and the second serviced smaller activity. The appellant served as the installation's technical expert on matters involving the local housing program for the two serviced activities that provided housing for members of other service branches, including active duty National Guard and Reserves. As a result, the appellant had contact with civilian housing personnel or military supervisors of other service branches to resolve problems involving differing housing policies or infractions of Department housing rules by the members of the other

services. These contacts included discussing policies implemented by the appellant's activity that were of interest to housing officials of another installation. However, these contacts were for the purpose of exchanging information regarding the solution to a specific local problem, not for the purpose of providing advisory services to another agency regarding the management of their housing program, as is required at Level 5-4. The appellant also periodically participated in various groups involved in the analysis of existing Department policies and instructions and provided recommendations and comments regarding changes or modifications in policy. However, the focus of the appellant's work was the implementation of the housing program at the local level and not the development of housing management programs and policies at the agency level for use by other housing specialists. Level 5-3 was credited to the position.

The grade of the appellant's position was sustained.