

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

Dallas Oversight Division  
1100 Commerce Street, Room 4C22  
Dallas, TX 75242-9968

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

**Appellant:** [appellant's name]

**Agency classification:** Fire Management Officer  
GS-401-12

**Organization:** [appellant's activity]  
[a specific] State Office  
Bureau of Land Management  
Department of the Interior  
[geographic location]

**OPM decision:** GS-401-12  
title at agency discretion

**OPM decision number:** C-0401-12-01

/s/ Bonnie J. Brandon

---

Bonnie J. Brandon  
Classification Appeals Officer

January 8, 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:

[servicing personnel office]

Director  
National Human Resources Management  
Center  
Bureau of Land Management  
Department of the Interior  
P.O. Box 25047  
Denver, Colorado 80225

Director of Personnel  
Department of the Interior  
Mail Stop 5221  
1849 C Street, NW.  
Washington, DC 20240

## **Introduction**

On August 30, 2000, the Dallas Oversight Division of the U.S. Office of Personnel Management accepted a classification appeal from [the appellant]. The appellant is employed in the [appellant's activity], [a specific] State Office, Bureau of Land Management (BLM), Department of the Interior, in [geographic location]. His position is classified as Fire Management Officer, GS-401-12. He believes his position should be graded at the GS-13 level. We have accepted and decided this appeal under section 5112 of title 5, United States Code.

On April 14, 2000, a contractor working under an agreement with the BLM-[state] evaluated the appealed position. The contractor concluded that the position should be classified at the GS-13 level. On May 25, 2000, the BLM-[state] classifier officially classified the position description of the appealed position [number] at the GS-12 level. This action occurred in conjunction with an undated advisory opinion from BLM's National Human Resources Management Center finding the position properly classified at the GS-12 level.

On July 30, 2000, the appellant was officially reassigned to position description [number] as a result of the position review. The position review resulted only in a redescription of the position's major duties and responsibilities with no change to the grade. The appellant agrees that his current position description is accurate, but he disagrees with his agency's classification decision. Specifically, he disagrees with the assessment of two factors under the technical program management aspects of his position: Factor 1, Knowledge Required by the Position, and Factor 4, Complexity. He also disagrees with the assessment of four factors evaluated under the General Schedule Supervisory Guide: Factor 1, Program Scope and Effect; Factor 3, Supervisory and Managerial Authority Exercised; Factor 5, Difficulty of Typical Work Directed; and Factor 6, Other Conditions.

To help decide the appeal, we conducted telephone audits with the appellant and his first-line supervisor. In reaching our decision, we reviewed all information of record furnished by the appellant and his agency as well as materials provided in conjunction with our telephone audits.

## **Position information**

The BLM is responsible for managing 264 million acres of land, about one-eighth of the land in the United States. Most of the lands are located in the western United States, an area dominated by extensive grasslands, forests, high mountains, and deserts. In [the appellant's specific state], BLM is responsible for about 22 million acres that represent more than 40 percent of the state's land base. The remaining public lands, about 16 million acres, are under the control of other Federal agencies such as the National Park Service, the U. S. Forest Service (USFS), the Bureau of Indian Affairs, and the Department of Defense.

[A specific field office] is one of five BLM field offices in [the appellant's state] where fire management programs and operations are carried out. The other BLM field offices are [geographic locations]. As the Fire Management Officer (FMO) for [a specific] Field Office, the appellant serves as the principal staff assistant to the Coordinating Field Office Manager, [in a specific] Field Office (BLM). The Field Office Manager shares supervision of the appellant with

the Forest Supervisor of [a specific] National Forest (USFS) since the appellant is also the principal fire management program manager for the USFS in [a portion of the appellant's state].

The appellant provides program development, direction and operation, and evaluation of the fire and fuels program for [a specific] Interagency Fire Management Area. The appellant operates as part of a management team for BLM and USFS and communicates directly on a regular basis with the USFS Regional Fire and Aviation Manager and with the BLM State Fire Management Officer (SFMO). The [appellant's specific] Interagency Fire Management Area encompasses approximately 12.1 million acres of BLM, USFS, National Park Service, and other public lands in [a portion of the appellant's state]. It includes [two] Field Offices, [a specific] Field Station, [a specific] National Forest, [a specific] Ranger District of [a specific] National Forest, and [a] National Park. The area has a history of intense wildland fire activity and high natural resource values.

The [appellant's] Interagency Fire Organization [abbreviation] is jointly staffed and funded by BLM and the USFS. It is a subset of [a specific] Coordination Center [abbreviation], located in [city]. The [specific Coordination Center] is the most significant interagency facility in the state for fire management activities. It is one of 11 interagency geographic centers throughout the country that supports emergency response and fire prevention efforts; coordinates emergency response resources such as equipment, aircraft, and personnel; and provides vital communications between multiple agencies in emergency situations. The BLM [state] Office has permanent lead agency responsibility for this facility. The [Coordination Center] is responsible for a geographic area that includes [two states, three National Parks, and portions of two states].

Two Zone Fire Control Officers (FCO's) assist the FMO in carrying out fire program duties and responsibilities for the [appellant's Interagency Fire Organization (IFO)]. [One] Zone FCO (funded by BLM) is based in [a specific city] and is responsible for five to six million acres that cover [a] Field Office [and two Ranger Districts]. The [other] Zone FCO (funded by USFS) is based in [a specific city] and is responsible for [a] Field Office and two Ranger Districts. [One] Zone FCO also has overall responsibility for aviation, prevention, and safety for the [appellant's IFO] and directly supervises the Helicopter Manager. Both Zone FCO's supervise Assistant Fire Control Officers (AFCO's) who help take appropriate actions on all wildland fires and apply fire to the landscape to meet resource objectives. AFCO's supervise seasonal fire engine crews who usually work four months a year.

The Fire Center, located in [a city], is the dispatching arm of the [appellant's IFO]. The Center Manager maintains communications and coordinates activities with Federal, State, and local fire management agencies such as the [Coordination Center] and the National Weather Service. This position supervises up to 20 support and/or supervisory dispatchers during sustained emergency operations.

The appellant's position directly supervises six positions: the Center Manager, the two Zone FCO's, and three GS-460-11 professional/scientific positions (Fire Planner, Fuels Specialist, and Fire Ecologist). The appellant serves as the second-line supervisor for all other positions [in the appellant's IFO]. He spends 50 percent of his time performing supervisory work. The appellant

distinguishes his position from other BLM field office FMO's in that he directly supervises non-BLM employees, and the other FMO's do not. All FMO's have interagency coordinating roles.

The appellant directs the preparation and revision of short- and long-range fire management plans for [a specific] Interagency Fire Management Area. This includes collecting, compiling, analyzing, and interpreting data relative to fire preparedness and suppression activities, prescribed burning, smoke management, and fuels management. Fire Management Plans (FMP's), prepared by BLM field offices, are guided by BLM national office fire policies which, in part, include the role of fire in the ecological process and interagency cooperation. Field office FMP's are consolidated into a multiyear State FMP. The [appellant's] Field Office Manager approves [the field office's] plan before it is reviewed and consolidated into the State FMP by the SFMO. The appellant coordinates the plan with the SFMO on a pre-submission basis. According to the State FMP, the [appellant's] Field Office has used prescribed fire for resource management activities for many years, primarily in the areas of fuel hazard reduction, range improvement, and wildlife habitat enhancement. The appellant also participates and coordinates with USFS regional staff in the development of [a specific] National Forest FMP.

BLM field office FMO's regularly communicate with the SFMO to develop staffing proposals; discuss budgetary issues, fire activity, and program priorities; and collaborate on Statewide readiness reviews before the fire season begins, usually between May and September. The SFMO ensures that adequate personnel (mostly trained career seasonal employees, e.g., firefighters and smokejumpers) are available for deployment during the fire season.

The SFMO manages the State's aviation support resources in readiness for initial attack actions. [The appellant's state's] aviation support resources include an air tanker and lead plane located at [a city], two fixed-wing detection aircraft stationed at [two cities], a single-engine air tanker at [a city], a helicopter and crew at [a city], and a shared helicopter and single-engine air tanker at [a city, state]. If more air support is needed during the fire season, the appellant asks other agencies to loan aircraft. [The appellant's field office] aviation equipment is also used for special use flying such as wild horse roundups and aerial photo surveys. The appellant monitors contracts for a helicopter pilot at [a city] and for fuel. According to these contracts, the [appellant's IFO] has exclusive use of the helicopter during the fire season. The appellant maintains flight records and makes sure the terms of the contract are upheld. BLM's national office negotiates the contracts on a three-year cycle.

### **Series, title, and standard determination**

The duties and responsibilities of most positions are covered by one occupational series, and the series determination is clear. Some positions, however, such as the appellant's position, are a mix of duties and responsibilities covered by more than one series. The appellant's position serves as the [appellant's IFO's] expert in fire and aviation management and requires substantial knowledge and experience in all levels of fire suppression, prescribed fire, fire prevention, fuels management, and aviation fire support. The [appellant's] Interagency Fire Management Area includes a wide range of vegetation and habitats located in mountains, deserts, forests, and grasslands. The appellant's position necessitates a broad general knowledge and understanding of ecosystem management and the principles of multiple-use management of public lands. We

find that the appellant's position is best covered by the GS-401 series. The appellant does not contest the agency's assignment of his position to the GS-401 series. The GS-401 series contains no prescribed titles. The title assigned by the agency is *Fire Management Officer*. We agree that this is an appropriate title because it represents the position's primary role and responsibilities.

There are no grading criteria for positions classified in the GS-401 series. In such cases, the *Introduction to the Position Classification Standards* says to apply criteria in a standard or standards for related kinds of work. The standard selected for a cross-series comparison should cover work as similar as possible to the kind of work performed, the qualifications required to do the work, the level of difficulty and responsibility, and the classification factors that have the greatest influence on the grade level.

Given the nature of the appealed position's work, we find that the fire and aviation program duties are best evaluated by cross referencing standards for the Rangeland Management Series, GS-454, and the Forestry Series, GS-460. Comparable to the appealed position, the GS-454 standard covers positions that require professional knowledge and competence in rangeland management in order to protect the natural resources and develop programs for rangeland use and conservation. Also comparable to the work of the appellant's position, the GS-460 standard covers positions that primarily require professional knowledge and competence in forestry science to protect resources against fire and other depredations and to develop comprehensive long-range land management plans. Part I of the GS-460 standard evaluates nonresearch positions in which nonsupervisory responsibilities are grade controlling. Therefore, Part I is used to evaluate the appellant's nonsupervisory work.

The General Schedule Supervisory Guide (GSSG) is used to grade supervisory work and related managerial responsibilities that are accomplished through the combined technical and administrative direction of others; constitute a major duty that occupies at least 25 percent of the position's time; and meet at least the lowest level of Factor 3 of the GSSG. The GSSG is used to evaluate the appealed position's supervisory work and managerial responsibilities.

## **Grade determination**

### ***Evaluation using GS-454 and GS-460 standards***

The GS-454 and Part I of the GS-460 standards are written in Factor Evaluation System (FES) format. Under the FES, positions are evaluated based on nine factors that define the minimum characteristics needed to receive credit for each factor level description. If a position fails to meet the criteria in a factor level description in any significant aspect, it must be credited at a lower level. The total points assigned to each factor level are totaled and converted to a grade by use of the grade conversion table in the standard. Grade conversion tables for the GS-454 and GS-460 standards have the same point scales.

The appellant questions the agency's evaluation of Factors 1 and 4. We carefully reviewed the agency's determinations for Factors 2, 3, and 5 through 9 and agree with its findings. Therefore, our evaluation focuses on those factors with which the appellant disagrees.

*Factor 1, Knowledge required by the position*

This factor measures the nature and extent of information or facts the individual must understand to do acceptable work, e.g., steps, procedures, practices, rules, policies, theories, principles, and concepts, and the nature and extent of the skills needed to apply the knowledge.

Level 1-7 requires professional knowledge of a wide range of principles and concepts in an intensive resource or subject-matter program and the skill to solve problems covering diverse situations and assignments. Assignments require sound professional knowledge and skills sufficient to modify or adapt standard processes and procedures and assess, select, and apply appropriate precedents. Knowledge of ecological processes and the interrelationships of related disciplines such as wildlife biology, forestry, and soil conservation is needed to plan multiple-use programs. Sufficient administrative and coordinative skills are needed for developing a variety of integrated annual work plans for complex projects and for reviewing and critiquing the operational implementation of the plans. At this level, the specialist serves as the principal expert and technical advisor in a geographic area, provides program management and quality control for a district program, or serves as the senior program specialist for an assigned specialization.

Level 1-8 requires mastery of the profession so that new scientific findings, developments, and advances may be used to solve critical problems of a particularly unique, novel, or highly controversial nature. The individual uses knowledge and skills to develop or refine solutions or recommendations on complex problems, take actions that have a significant impact on existing agency policies and programs, and develop new approaches for use by other program specialists. Typically, the individual is recognized as the technical authority in the resource program. At this level, the specialist serves as a program expert, advising principal program managers at the agency level. The specialist plays a key role in the overall planning and administration of the program by developing long-term, multiple-use plans and regional direction; making inspections of units for evaluation purposes; and maintaining cooperative relationships with other agencies and interest groups.

The appellant's position compares favorably and is fully equivalent to Level 1-7. As the technical authority for the [appellant's IFO], the appellant is responsible for developing and reviewing fire management and air operations programs for [a portion of a state]. He works directly with the USFS Regional Fire and Aviation Program Manager and the BLM SFMO to establish goals and objectives for implementation within the covered area. Overall, the [appellant's IFO] is managed as one area, but fire use planning and management are governed by different rules. Two separate FMP's are used for BLM lands and USFS lands and each plan contains priorities and procedures that differ from the other plan. The appellant directed the final preparation and implementation of [a specific] National Forest fire use plan, which includes provisions for allowing natural fires to burn for resource benefit. Under this type of fire use, each lightning fire is evaluated to see if it will benefit resource objectives, and then a plan is implemented to manage the fire to accomplish objectives. The [specific National Forest's] inclusion of natural fire to accomplish resource objectives is unique for the USFS. BLM and USFS also differ in human resource, purchasing, budgeting, and other administrative procedures. As a member of BLM's and USFS's leadership teams, the appellant must keep informed of each

agency's policies and changes in order to provide accurate advice and information. The appellant applies a substantial knowledge of fire ecology, fire behavior, fire hazard and risk analysis, fuel volume and flammability, smoke management techniques, and aircraft operating characteristics sufficient to deal with serious fire incidents. The appellant employs a substantive understanding of multiple-use land resources so that fire management techniques and objectives have complementary effects on woodlands, native grasses, wildlife habitats, and forests.

The GS-454 standard provides illustrations at Level 1-7 that are comparable to the appellant's position. Level 1-7 is found in intermediate program coordinating work where the specialist serves as the principal expert and technical advisor for a program in the geographic area. The specialist serves as the senior program specialist for specific elements of the area's programs to achieve multiple-use management goals and objectives. The specialist develops long-range program plans, annual budget and work plans, prepares guidance for implementing these within the assigned area of responsibility, and develops supplemental district guidance as necessary. The GS-460 standard also provides illustrations at Level 1-7 that are comparable to the appellant's position. Included in Level 1-7 are positions that require knowledge and skills sufficient to coordinate the development or modification of intensive and comprehensive long-range management plans for forested and related areas of a second level unit.

The appellant's position does not fully meet Level 1-8. The appellant is not required to apply new scientific findings and solve critical problems that are particularly unique, novel, or highly controversial. While guidelines are sometimes incomplete and inadequate to deal with new or growing programs such as smoke management and prescribed fires, the BLM SFMO and the USFS Regional Fire and Aviation Manager can provide needed technical assistance. The level of knowledge required of the appealed position does not match that of positions illustrative of Level 1-8. At Level 1-8, the specialist serves as a program expert, advising principal program managers at the agency level and below by interpreting broad legislative requirements and developing policy guidelines for their implementation.

This factor is evaluated at Level 1-7 (1250 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 is characterized by a variety of assignments consisting of diverse and complex technical or administrative problems and considerations. Problems typically require in-depth analysis and the evaluation of alternatives because of complicating factors such as environmental problems whose resolution may have serious public impact or conflicting pressures to redirect management strategies. Demands may result in appeals to higher level agency officials or formal legal action.

At Level 4-5, the work is characterized by a variety of assignments and problems arising on a number of geographically and environmentally varied public lands (such as a region



encompassing several states). The specialist is independently responsible for coordination, liaison, and planning activities for broad resource programs or for intensive analysis and problem solving in the program area of the employee's expertise. The work involves solving problems concerned with novel, undeveloped, or controversial aspects of rangeland management, forestry, and related fields, such as fire management. The problems are difficult because of such characteristics as the inability to overcome problems in the past. At this level, problems have become complex or difficult and involve serious conflicts between scientific information, program, and economic requirements. Assignments require the specialist to be especially versatile and innovative in order to recognize new directions or approaches, to devise new or improved strategies to obtain effective results, or to anticipate future trends and requirements in resource use and demands.

The appellant's position fully meets Level 4-4. Duties and responsibilities encompass multiple programs affecting the ecological relationship of public, State, private, BLM, and USFS lands in [a portion of a state]. Programs include fire suppression, prescribed fire, smoke management, and fuels management. The appealed position uses Geographic Information System and Global Positioning System technology and computer-assisted analyses in order to perform the work more effectively. The appellant is responsible for the fire management programs and operations for the [appellant's IFO], an area that has a history of intense wildland fire activity and high natural resource values. Fire management programs are intensely managed and require the appellant to cultivate good relationships with a range of fire management professionals.

The appellant's position does not fully meet Level 4-5. The [appellant's] Interagency Fire Management Area encompasses approximately 12.1 million acres of BLM and public lands in [a portion of a state]. It includes [two] Field Offices, [a specific] Field Station, [a specific] National Forest, [a Ranger District] of [a specific] National Forest, and [a specific] National Park. This area is not equivalent to the wide geographic area envisioned at Level 4-5. In addition to operating in a much smaller territory, the appellant's assignments do not match the complexity of work at Level 4-5, which describes assignments involving abstract concepts or serious conflicts between scientific information and program and economic requirements. Further, the appellant's work does not involve solving problems with novel or undeveloped aspects illustrative of work at Level 4-5.

This factor is evaluated at Level 4-4 (225 points).

### *Summary*

In sum, we have evaluated the nonsupervisory work of the appellant's position as follows:

<b>Factor</b>	<b>Level</b>	<b>Points</b>
1. Knowledge required by the position	1-7	1250
2. Supervisory controls	2-4	450
3. Guidelines	3-4	450
4. Complexity	4-4	225
5. Scope and effect	5-4	225
6. Personal contact	6-3	60
7. Purpose of contacts	7-3	120
8. Physical demands	8-2	20
9. Work environment	9-2	20
<b>Total</b>		<b>2,820</b>

A total of 2,820 points falls within the GS-12 range of 2,755 to 3,150 points on the Grade Conversion Table of the GS-454 and GS-460 classification standards. Crediting Level 3c in applying the GS-454 standard results in the same point values for Factors 6 and 7.

### *Evaluation using the GSSG*

The GSSG uses a point-factor evaluation approach with six evaluation factors designed specifically for supervisory positions. The points for all levels are fixed and no interpolation or extrapolation of them is permitted. If one level of a factor is exceeded, but the next higher level is not met, the factor is credited at the lower level. Points accumulated under all factors are converted to a grade using the guide's point-to-grade conversion table. When nonsupervisory duties evaluate to a different grade than the position's supervisory duties, the final grade of the position is the grade for the higher level duties.

The appellant questions the contractor's evaluation of Factors 1 and 3 and the agency's evaluation of Factors 5 and 6. We carefully reviewed the contractor's and agency's determinations for Factors 2 and 4 and agree with the findings. Therefore, our evaluation of the appellant's supervisory duties focuses on those factors with which the appellant disagrees.

### *Factor 1, Program scope and effect*

This factor has two components, scope and effect. The full intent of the criteria for both components must be fully met in order to assign a particular factor level.

#### *Scope*

Program scope addresses the general complexity and breadth of the program and work directed, including geographic and organizational coverage. At Level 1-2, 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, or comparable activities within agency program segments. Illustrative of this level are positions that direct budget, supply, maintenance, or similar services at an agency field office of moderate size and limited complexity. At Level 1-3, positions direct a program segment and work that typically encompass a major metropolitan area, a State, or a small region of several States. Positions that oversee the construction of complex facilities for one or more agencies at multiple sites are illustrative of this level. Also illustrative are positions which direct administrative services that support and directly affect the operations of a bureau or a major military command headquarters.

The appellant's position meets Level 1-2. The geographical area of the [appellant's] Interagency Fire Management Area involves six rural counties in [a portion of a state]. The counties include several small cities with populations ranging from a few hundred to over 7,000. The total population of the serviced area is not directly and significantly serviced by the program. Fire suppression and prescribed burn activities are carried out on BLM and USFS lands. The appellant's position does not meet the definition and illustrative examples that are characteristic of Level 1-3.

### *Effect*

Effect addresses the impact of the program areas and work directed on the mission and programs of the agency, the activity, other agencies, other activities in or out of the Government, and the general public. At Level 1-2, services or products support and significantly affect installation level, area office level, or comparable program segments, or provide services to a moderate, limited population comparable to a rural county. At Level 1-3, activities directly and significantly impact a wide range of agency activities, the work of other agencies, or the general public. At the field activity level, the work directly involves providing essential support operations to numerous, varied, and complex technical, professional, and administrative functions. Illustrative of this level are positions that direct administrative services which support and directly affect bureau operations or a group of organizations which, as a whole, are comparable.

The appellant's position fully meets Level 1-2 but does not meet the definition and illustrative examples that are characteristic of Level 1-3. Therefore, Level 1-3 cannot be credited. The appellant directs prescribed fire projects on BLM and USFS lands in [a portion of a state]. While unwanted fires on the area's 12.1 million acres impact a wide range of BLM and USFS activities, the program does not directly affect the operations of either agency as envisioned at Level 1-3.

This factor is evaluated at Level 1-2 (350 points).

### *Factor 3, Supervisory and managerial authority exercised*

This factor covers the delegated supervisory and managerial authorities which are exercised on a recurring basis. To be credited with a level under this factor, a position must meet the authorities and responsibilities described for the specific level.

To be credited at Level 3-2, positions must meet one of three descriptions. Level 3-2a contains criteria for evaluating positions that supervise production-oriented work. Level 3-2b covers supervision in organizations where work is contracted out. Neither Level 3-2a nor Level 3-2b is appropriate for the appellant's position. Level 3-2c is the appropriate description to use in evaluating the appellant's supervisory duties and responsibilities.

The appellant carries out all of the authorities and responsibilities described at Level 3-2c. He develops annual work plans for the [appellant's IFO's] Fire and Aviation Management Program. Priorities and objectives for subordinates are set during monthly fire management meetings, and

short-term priorities are adjusted throughout the year in response to fire incidents. The appellant reviews performance plans annually with subordinates, makes changes as needed, and prepares performance evaluations at the end of the rating cycle. He provides technical and administrative advice and instruction to subordinates based on his previous training and experience as a firefighter and Zone FMO. The appellant serves as the selecting official for all direct reporting positions and approves selections recommended by subordinate supervisors. He hears EEO complaints and grievances and attempts to resolve them. The appellant also effects minor discipline, such as warnings and reprimands, and recommends more serious disciplinary actions when circumstances warrant. Annually, the appellant and staff develop individual development plans. The appellant regularly evaluates fire season performance to identify areas for improvement for subsequent seasons.

To be credited at Level 3-3, positions must meet either paragraph a or b of the factor description. Level 3-3a is applicable to positions that are closely involved with high level program officials, or comparable agency level staff personnel, in developing overall goals and objectives for assigned programs. This is not characteristic of the appellant's position.

Level 3-3b is appropriate for positions that exercise at least 8 of 15 authorities specified in the factor description. The appellant's position meets 10 of the elements: 1 through 9 and 15. The position meets responsibility 1 because it uses three subordinate supervisors to carry out fire management program activities using approximately 70 employees, some of whom are seasonals, throughout two zones and the Fire Center. Responsibility 2 is met because the appellant exercises significant responsibilities in dealing with agencies that are part of the [appellant's IFO], State and local officials, and the BLM SFMO and the USFS's Regional Fire and Aviation Program Manager. The position meets responsibility 3 because the appellant reviews performance plans annually with subordinates, makes changes as needed, and prepares or reviews performance evaluations at the end of the rating cycle to assure that reasonable equity is maintained throughout the [appellant's IFO]. Responsibility 4 is met because the appellant directs a major program segment with significant resources. The appellant estimates that the [appellant's] Interagency Fire Management Area has an annual payroll and budgetary outlay of approximately three million dollars. The appealed position meets responsibility 5 because the appellant directs operating program activities for the Area in part by making decisions on work problems presented by subordinate supervisors. Responsibility 6 is met because the appellant rates the performance of the six positions he directly supervises and serves as the second-level reviewing official for staff the Zone FCO's and Center Manager supervise. Responsibility 7 is met because the appellant approves selections for subordinate nonsupervisory positions. The position meets responsibility 8 because the appellant is authorized to select candidates for subordinate supervisory positions. Responsibility 9 is met because the appellant hears and attempts to resolve all complaints and grievances regardless of the seriousness. Finally, the appellant's position meets responsibility 15 because the appellant is empowered to identify and implement ways to reduce significant bottlenecks and improve business practices.

The appellant's position does not meet responsibilities 10 through 14. Responsibility 10 is not met because the appellant cannot approve serious disciplinary actions. These must be approved by higher management. The position does not meet responsibility 11 because higher management makes decisions about nonroutine, costly, or controversial training. The appealed

position does not meet responsibility 12 because the appellant does not oversee the work of contract employees in the same manner in which he directs and oversees the work of subordinate employees. The only contract related work the appellant performs is signing payment vouchers involving fuel and the services of a helicopter pilot. Although the appellant is authorized to approve within grade increases, responsibility 13 is not fully met because the appellant does not have the authority to approve extensive overtime. Finally, responsibility 14 is not fully met because the appellant cannot propose substantive changes in position classification which could reasonably be expected to change the composition of the Area's authorized personnel. Even though the appellant has developed some position descriptions for the interagency organization, descriptions for other positions, like crewmembers and leaders, are standard position descriptions. Because the appellant exercises 10 of the 15 authorities specified in the factor description, Level 3-3b is met.

Level 3-4 may be credited only after it is established that the position involves responsibilities that are equivalent to or exceed *all of those described in both paragraphs a and b of Level 3-3*. The appellant's position does not meet the criteria for Level 3-3a. For this reason, there is no need to evaluate the position against Level 3-4a or Level 3-4b since the position fails to meet the minimum criteria for Level 3-4.

This factor is evaluated at Level 3-3b (775 points).

*Factor 5, Difficulty of typical work directed*

This factor measures the difficulty and complexity of the basic work most typical of the organization directed, as well as other line, staff, or contracted work for which the supervisor has technical or oversight responsibility, either directly or through subordinate supervisors.

For the appellant's position, the work is carried out through subordinate supervisors who provide administrative as well as technical supervision to those they supervise. The predominant work of the [appellant's IFO] is classified in the GS-462 Forestry Technician Series. The remaining mission-oriented work is directly supervised by the appellant and is classified as interdisciplinary GS-454/460 work. All nonsupervisory work performed by employees in these series is applicable in determining the difficulty of the typical work directed.

The work of AFCO's is credited at 50 percent to account for supervisory duties the positions perform. Career seasonal positions are credited at 100 percent. These positions are guaranteed six months of duty per year. However, for the past three years, career seasonal employees have worked 12 months of the year because of dry weather conditions. Temporary seasonal positions typically work 4 months of the year during the fire season, so each position is credited as 1/3 work year.

The highest grade that best characterizes the nature of the mission-oriented nonsupervisory work is GS-7 because 25 percent or more of the nonsupervisory duty hours is expended on work at or above the base level credited. The following tables show how the workload was credited to arrive at 70.70 work years.

<u>Grade</u>	<u>Work Years</u>	<u>Percent of Workload</u>
GS-11	3.00	4.24
GS-9	4.35	6.15
GS-8	1.00	1.41
GS-7	19.00	26.87
GS-6	1.00	1.41
GS-5	19.67	27.82
GS-4	14.34	20.28
GS-3	8.34	11.80
	<u>70.70</u>	

Table 1: West Zone

Position Type	Work Schedule	Number of Positions	Nonsupervisory Workload	Grade Level	Work Years
AFCO	Perm FT	2	50%	GS-9	1.00
AFCO	Career Seasonal	1	50%	GS-9	0.50
Prevention Tech	Perm FT	1	100%	GS-7	1.00
Engine Crew	Career Seasonal	13	100%	GS-7	13.00
Engine Crew	Career Seasonal	13	100%	GS-5	13.00
Engine Crew	Seasonal	6	33%	GS-5	2.00
Engine Crew	Seasonal	32	33%	GS-4	10.67
Engine Crew	Seasonal	17	33%	GS-3	5.67

Table 2: East Zone

Position Type	Work Schedule	Number of Positions	Nonsupervisory Workload	Grade Level	Work Years
AFCO	Perm FT	2	50%	GS-9	1.00
Helicopter Mgr	Perm FT	1	100%	GS-9	1.00
Asst Helicopt Mgr	Career Seasonal	1	100%	GS-8	1.00
Engine Crew	Career Seasonal	4	100%	GS-7	4.00
Helitack Crew	Career Seasonal	1	100%	GS-6	1.00
Engine Crew	Career Seasonal	4	100%	GS-5	4.00
Engine Crew	Seasonal	2	33%	GS-5	0.67
Engine Crew	Seasonal	9	33%	GS-4	3.00
Helitack Crew	Seasonal	2	33%	GS-4	0.67
Helitack Crew	Seasonal	2	33%	GS-3	0.67
Engine Crew	Seasonal	6	33%	GS-3	2.00

Table 3: [the appellant's IFO] Fire Center and Direct Reporting Positions

Position Type	Work Schedule	Number of Positions	Nonsupervisory Workload	Grade Level	Work Years
Fire Planner	Perm FT	1	100%	11	1.00
Fire Ecologist	Perm FT	1	100%	11	1.00
Fuels Specialist	Perm FT	1	100%	11	1.00
Logistics Coord	Perm FT	1	85%	9	0.85
Ranger/Forestry Tech	Career Seasonal	1	100%	7	1.00

This factor is evaluated at Level 5-4 (505 points).

### *Factor 6, Other conditions*

This factor measures the extent to which various conditions contribute to the difficulty and complexity of carrying out supervisory duties, authorities, and responsibilities. Conditions affecting work for which the supervisor is responsible may be considered if they increase the difficulty of carrying out assigned supervisory and managerial duties and responsibilities.

The appealed position meets Level 6-2. The position oversees technician work comparable in difficulty to GS-7. The appellant's position does not meet Level 6-3 which requires the supervisor to have full and final technical authority over base level work at the GS-7 or 8 level. Full and final technical authority means that the supervisor is responsible for all technical determinations arising from the work, without technical advice or assistance on even the more difficult and unusual problems, and without further review except from an administrative or program evaluation standpoint. Credit for this is limited to situations involving an extraordinary degree of finality in technical decision-making. The [appellant's] Field Office Manager relies on the appellant for technically correct analyses, recommendations, and suggestions. However, technical advice and assistance on particularly difficult issues would normally be coordinated with the BLM SFMO and/or the USFS Regional Fire and Aviation Manager.

When the level selected for this factor is either 6-1, 6-2, or 6-3, the GSSG requires consideration of eight special situations that may complicate the supervisory or oversight work.

#### 1. Variety of work

This situation is credited when more than one kind of work, each kind representing a requirement for a distinctly different additional body of knowledge on the part of the supervisor, is present in the work of the unit. The predominant work of the [appellant's] Interagency Fire Management Area is classified in the GS-462 Forestry Technician Series. The remaining mission-oriented work of the unit is classified as interdisciplinary GS-454/460 work. There is no distinctly different additional body of knowledge required; therefore, this situation cannot be credited.

#### 2. Shift operations

This situation is credited when the position supervises an operation carried out on at least two fully staffed shifts. Normally, the appellant does not supervise work that is carried out in shifts. Extraordinary hours only occur during the fire season. This situation cannot be credited.

#### 3. Fluctuating workforce or constantly changing deadlines

This situation is credited when the workforce supervised by the position has large fluctuations in size. A substantial number of positions in the [appellant's] Field Office are filled by seasonal employees who normally work only during the fire season. It is appropriate to credit this factor when there are significant seasonal variations in staff. Credit for this situation is appropriate for the appellant's position.

#### 4. Physical dispersion

This situation is credited when a substantial portion of the workload for which the supervisor is responsible is regularly carried out at one or more locations which are physically removed from the main unit, such as in different buildings or widely dispersed locations in a large warehouse. To be credited, conditions must make day-to-day supervision difficult to administer. Although a substantial portion of the workload in the appellant's organization is conducted at physically dispersed sites, subordinate supervisors are in place to ensure that adequate supervision is provided. This situation cannot be credited.

#### 5. Special staffing situations

This situation is credited when (1) a substantial portion of the workforce is regularly involved in special employment programs; (2) requirements for counseling and motivational activities are regular and recurring; and (3) job assignments, work tasks, working conditions, and/or training must be tailored to fit the special circumstances. These circumstances are not applicable to the appellant's position; therefore, this situation cannot be credited.

#### 6. Impact of specialized programs

This situation is credited when supervisors are responsible for a significant technical or administrative workload in grades above the level of work credited in Factor 5, provided the grades of this work are not based upon independence of action, freedom from supervision, or personal impact on the job. The appellant directly supervises three subordinate supervisors and three GS-11 fire management specialists. This does not represent a significant technical or administrative workload for the appellant's position. This situation cannot be credited.

#### 7. Changing technology

This situation is credited when work processes and procedures vary constantly because of the impact of changing technology, creating a requirement for extensive training and guidance of the subordinate staff. The technology of firefighting does not vary constantly because of the impact of changing technology. This situation cannot be credited.

#### 8. Special hazard and safety conditions

Credit for this situation is appropriate when the supervisory position is regularly made more difficult by the need to make provision for significant unsafe or hazardous conditions occurring during the performance of the work of the organization. Firefighting activities involve hazardous conditions which warrant credit for this situation.



The appellant's position meets only two situations, 3 and 8. To credit the position with an additional level requires meeting three of the eight situations. The appellant's position does not meet this threshold. Consequently, an additional level cannot be added to Level 6-2.

This factor is evaluated at Level 6-2 (575 points).

### *Summary*

In sum, we have evaluated the appellant's supervisory duties and responsibilities as follows:

<b>Factor</b>	<b>Level</b>	<b>Points</b>
1. Program scope and effect	1-2	350
2. Organizational setting	2-2	250
3. Supervisory and managerial authority exercised	3-3b	775
4. Personal contacts		
A. Nature of contacts	4A-2	50
B. Purpose of contacts	4B-2	75
5. Difficulty of typical work directed	5-4	505
6. Other conditions	6-2	575
<b>Total</b>		<b>2,580</b>

A total of 2,580 points falls within the GS-11 range of 2,355 to 2,750 points on the Point-to-Grade Conversion Chart of the GSSG. Therefore, the appellant's supervisory duties and responsibilities are properly graded at GS-11.

### **Decision**

The appealed position's nonsupervisory work is evaluated at the GS-12 level. Supervisory duties and responsibilities are evaluated at the GS-11 level. When nonsupervisory duties evaluate to a different grade than the position's supervisory duties, the final grade of the position is the grade for the higher level duties. The grade for the higher level duties is GS-12. The appellant's position is properly classified as GS-401-12 with the title at the agency's discretion.