

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

**Appellant:** [Appellant]

**Agency classification:** Supervisory Architect  
GS-808-14

**Organization:** [Organization]  
[Organization]  
[Organization]  
National Park Service  
U.S. Department of the Interior  
[Location]

**OPM decision:** Supervisory Architect  
GS-808-14

**OPM decision number:** C-0808-14-01

\_\_\_\_\_/s/\_\_\_\_\_  
Robert Hendler  
Classification and Pay Claims  
Program Manager

\_\_\_\_\_/9/30/08\_\_\_\_\_  
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*, appendix 4, section G (address provided in appendix 4, section H).

**Decision sent to:**

[Appellant]

[Address]

[Location]

[Name]

[Organization]

National Park Service

[Location]

Director of Personnel

U.S. Department of Interior

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## **Introduction**

On October 18, 2007, the Philadelphia Oversight and Accountability Group (POAG), formerly the Philadelphia Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [Appellant]. His position is currently classified as Supervisory Architect, GS-808-14. The appellant requests his position be upgraded to GS-15 and the title and series changed to Program Manager, GS-340. We received the complete agency appeal administrative report on May 15, 2008. The position is located in the [Organization], [Organization], [Organization], National Park Service (NPS), U.S. Department of the Interior (DOI), in [Location]. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C).

To help decide this appeal, we conducted telephone audits with the appellant on May 29, 2008, June 5, 2008, and August 5, 2008. We conducted a telephone interview with the appellant's first-level supervisor on June 11, 2008 and second-level supervisor on July 1, 2008. In reaching our classification decision, we have carefully considered all information of record, including the result of the interviews, as well as written information furnished by the appellant and his agency, including the position description (PD) of record which covers the major functions assigned to and performed by the appellant. We incorporate it by reference into this decision.

## **Background**

[Organization] is one of four NPS national training centers. [Organization's] primary mission is to support the preservation and maintenance of the historic structures of the NPS by providing historic preservation and maintenance training and development for employees. Unlike the other NPS training centers, [Organization] operates as a non-appropriated, reimbursable-service entity which supports facilities and maintenance across the NPS, and is recognized as having national expertise in actual execution of historic preservation verses academic or research expertise. [Organization] provides preservation technical consultants to other units of the NPS, Federal agencies, and international preservation organizations. Training and preservation services provided are inherently tied together as training is imbedded in preservation services.

## **General issues**

The appellant states his position should be reclassified to the Program Manager, GS-340 series, as is the case for the other NPS training center managers. He also makes various statements about his agency's review and evaluation of his position, and in part, based his appeal on his duties associated with the management and supervision of the reimbursable-service program. He states he has final authority for the full range of personnel actions; revision of the long-range strategies, plans, and goals for the work directed; and organizational design proposals recommended by subordinate supervisors. He states his reimbursable program multi-year and longer work plans have never been reviewed or approved by any NPS authority above his position, and he exercises final authority in the development and revision of the long-range strategies, plans, and goals for the work directed. In addition, there has been a substantial increase in the reimbursable program budget to approximately \$9.3 million and the addition of approximately 12 FTE in approximately the last two years.

By law, we must classify positions solely by comparing their current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, 5112). In adjudicating this appeal, our

responsibility is to make our own independent decision on the proper classification of his position. Since comparison to standards and guidelines is the exclusive method for classifying positions, we cannot compare the appellant's position to others, which may or may not be classified correctly, as a basis for deciding his appeal. Since our decision sets aside any previously issued agency decision, any actions previously taken by the agency in their review of the appellant's position are not germane to this classification appeal process.

### **Position information**

The appellant provides overall management and direction for programs and activities of the [Organization] including analysis, development, implementation, validation, and evaluation. The major programs and services directed by the appellant are a three-year training program for the NPS exhibit and preservation specialists; services for the treatment of NPS, Federal, state, or locally-owned historic properties; and an extensive outreach-training program aimed at building the skills of personnel responsible for the maintenance and preservation of historic properties. The appellant maintains overall responsibility for the assignment, completion, and review of the program's annual workload which averages more than 75 projects per year.

The appellant manages the [Organization] with the assistance of a Supervisory Exhibit Specialist, GS-1010-14, who acts as a Deputy. The [Organization] subordinate structure consists of four teams each of which is directed by a supervisor: masonry, carpentry, wood crafting, and project management. These sections are staffed with exhibit specialists, preservation-trade workers, and trainees who perform work on preservation projects. Through the supervision of subordinate supervisors, the appellant manages a staff of approximately 72 employees out of which 69 employees are funded entirely on a non-appropriated reimbursable basis. The appellant directly supervises four positions: one Supervisory Exhibit Specialist, GS-1010-14, one Human Resources Specialist, GS-201-13, one Facilities Management Specialist, GS-1640-13, and one Historic Architect, GS-808-13. For purposes of this appeal decision, we will assume all the subordinate positions are correctly classified.

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

The agency placed the appellant's position in the Architect Series, GS-808. As stated by the appellant's supervisor, even though the knowledge, skills, and abilities of a professional architect are not essential to the fundamental aspects of the position, they are beneficial to the operation; and management has allowed the appellant to assume the duties of a professional architect. Since the appellant possesses the qualifications of a professional architect and higher level management is using these qualifications to the benefit of the organization, the position is appropriately assigned to the GS-808 series. Based on the titling criteria found in the General Schedule Supervisory Guide (GSSG) and the Position Classification Standard for Architect, GS-808, the position is properly allocated as Supervisory Architect, GS-808.

### **Grade Determination**

The appellant asserts the grade of his position should be based on his programmatic responsibilities properly evaluated by application of the GSSG. The GSSG is a cross-series guide used to determine the grade level of supervisory positions in the General Schedule. It has six evaluation factors, each with several factor-level definitions and corresponding point values. A factor-level must be fully met before it may be credited. Positions are evaluated by crediting

the points designated for the highest level met under each factor and converting the total points to a grade by using the point-to-grade conversion chart in the guide.

### *Factor 1, Program Scope and Effect*

Scope addresses the general complexity and breadth of the program or work directed including the geographic and organizational coverage within the agency structure. The concept of Scope involves more than just geographic coverage. When one considers both the general factor-level criteria and the illustrations, a general pattern of analysis emerges. OPM guidance indicates there is a dynamic at work which deals with the interaction of four aspects implicit in the concept of Scope:

- *sweep*: the geographic coverage of the program (for instance, city, region, or state);
- *magnitude*: the total population serviced directly and significantly by the program (for instance, small and confined to an installation, moderate, or large);
- *importance*: the importance of the program to the agency and its mission (whether line or staff, whether involving service to higher agency levels, other agencies, or the general public); and
- *complexity*: the complexity of the products or services provided (for instance, routine or complicated).

The agency credited Level 1-3. In deciding whether a position meets a factor level, one must consider each of these implicit aspects and how they interact. No one aspect is necessarily predominant. We consider these aspects for the appellant's position below:

With respect to *sweep*, the appellant's position meets Level 1-3. At Level 1-3, the general factor-level criteria shows some programs cover a geographic area equal in size to a major metropolitan area, or a state, or a small region of service states. An illustration of programs providing services directly to the public at this level describes the size of the serviced population as equivalent to a geographic area of several rural counties, a small city, or a portion of a larger metropolitan area. Ninety percent of the appellant's work is to direct the preservation work which has been developed through agreement or contract with other National Parks nation-wide, and ten percent of the work directed is through agreement or contract with local, county, state, and other Federal Government agencies. The work is performed on a project basis in support of National Parks or external agreements/contracts which limits the geographical area when considered by population actually served through agreements or contracts. The training offered throughout NPS is also limited in comparability to geographic coverage as the number of trainees and available resources are restricted. At Level 1-4, the program coverage would involve the development of major aspects of key agency scientific, medical, legal, administrative, regulatory, policy development, or comparable highly technical programs. The appellant's program, however, cannot be construed as equivalent to major aspects of a **key** agency program. Rather, training and performing historic preservation is a function performed in support of key NPS programs, e.g., the managing and protection of national parks and their visitor education, cultural preservation, and similar programs.

With respect to *magnitude*, the appellant's position meets Level 1-2. The general factor-level criteria at Level 1-3 indicates when most of an area's taxpayers or businesses are covered, work directed typically has coverage comparable to a small city. Illustrative of magnitude at Level 1-3 is a position providing services directly to a population equivalent to the number of citizens in a

small city where the population may be concentrated in one place or located throughout a significant portion of a multi-state area. The populations directly affected by the appellant's programs are those to which he provides training, and those individuals or agencies covered by interagency agreements, cooperative agreements, and contracts to perform preservation facilities and maintenance work. As documented in the [Organization's] Annual Report FY 2007, 78 projects were either under contract or in agreement with NPS units and other agencies including the Army Corps of Engineers, Florida State Parks, and Howard County, Maryland. Although the appellant's programs and services are nationally available, the potential population directly serviced is restricted to the park managers or heads of other serviced units/agencies and their preservation program personnel throughout the country and relatively a small population of county, state, local and other Federal personnel exercising similar responsibilities. For purposes of this factor, these services directly support the NPS unit or other agency heads in the performance of their work, and not the general population who visit or use the facilities of these parks or agencies. Thus, this aspect of the appellant's position does not exceed Level 1-2.

With respect to *importance*, the appellant's position meets Level 1-2. Illustrative of Level 1-2 is an office which furnishes a significant portion of an agency's line program to the general public. In contrast, the appellant manages a support program which assists NPS agency managers who provide the major components of the NPS line programs to the general public, as discussed previously. Even though the appellant's geographical coverage is throughout the Nation, the appellant's projects are limited to the preservation services on a project basis, which support the managers and mission of the NPS or other agencies, but do not directly support the public or other population envisioned at Level 1-3. Instead, the appellant's program provides direct and substantial support services to an overall population, as discussed previously, which does not exceed that of a small population of users.

With respect to *complexity*, the appellant's position meets Level 1-3. The appellant is responsible for directing work which can be characterized as technical, administrative, and professional. The administrative work of the exhibit specialists involves the planning, evaluating, initiating, administrating, managing, and performing work on preservation projects which are often unique and complex. As described below under Factor 5, the appellant's base level of work is GS-11, and 43.27 percent of the non-supervisory/non-leader work of the [Organization] is performed at or above this grade level. The appellant's organization, when considered as a whole, performs technical, administrative, and professional work which meets the threshold for Level 1-3.

In sum, the appellant's position meets Level 1-3 with respect to sweep and complexity. With respect to magnitude and importance, the position falls short of Level 1-3 but meets Level 1-2. As noted earlier, none of these four aspects is necessarily predominant. However, considering all four aspects and how they interact, the appellant's position falls substantially short of Level 1-3 and must be evaluated at Level 1-2 for Scope.

### *Effect*

Effect addresses the impact of the work, the products, and/or the programs described under scope on the mission and programs of the customer, the activity, and other activities in or out of the Government, the agency, other agencies, the general public, or others.

At the Level 1-2, the services or products support and significantly affect installation level, area-office level, or field-office operations and objectives, or comparable program segments; or provide services to a moderate, local, or limited population of clients or users comparable to a major portion of a small city or rural country. In contrast, at Level 1-3, activities, functions, or services accomplished directly and significantly impact a wide range of agency activities, the work of other agencies, or the operations of outside interests, e.g., a segment of a regulated industry, or the general public. At the field activity level (involving large, complex, multi-mission organizations and/or very large serviced populations), the work directly involves or substantially impacts the provisions of essential support operations to numerous, varied and complex technical, professional, and administrative functions.

As discussed previously and comparable to Level 1-2, the services provided by the appellant support and affect the operations of a moderate, local, or limited population of clients, e.g., in this case NPS managers and other agencies who enter into agreements or contracts for services performed by technical and trades personnel. Even though the [Organization] is unique in which it provides preservation services through a reimbursable program, the appellant is not responsible for the overall preservation program for the NPS or other agencies. Instead, his program supplements and supports preservation services provided for and controlled by these agencies and other entities. Thus, the appellant's program cannot be credited as furnishing a significant portion of the agency's line program to the serviced population as required at Level 1-3. Therefore, this subfactor must be credited at Level 1-2.

Since the appellant's position warrants Level 1-2 for both Scope and Effect, Level 1-2 is assigned for 350 points.

### *Factor 2, Organizational Setting*

The appellant states his current PD does not reflect the supervisory controls as described in Factor 2, and believes his PD should be revised to read "*The Superintendent exercises final authority to plan, direct, execute and approve the [Organization] preservation services program and develop and attain long range goals that support the NPS mission to reduce the maintenance backlog.*" However, this factor considers the organizational situation of the supervisory position in relation to higher level management. The appellant's concern will be addressed under Factor 3 which is the appropriate factor.

At Level 2-2, the position is accountable to a position that is one reporting level below the first SES, flag or general officer or the equivalent, or higher level position in the direct-supervisory chain. In contrast, the Level 2-3 position is accountable to a position that is SES level, flag or general officer military rank, or equivalent of higher level; or to a position which directs a substantial GS/GM-15 or equivalent-level workload; or to a position which directs work through GS/GM-15 or equivalent-level subordinate supervisors, officers, contractors, or other.

Organizationally, the appellant reports to the Chief, Servicewide Employee Training and Development, a GS-201-15 position. This position, in turn, reports to the Assistant Director, Workforce Management, an SES position. Since the appellant is accountable to a position which is one reporting level below the first SES level, the appellant's position does not meet Level 2-3.

Level 2-2 is assigned for 250 points.

*Factor 3, Supervisory and Managerial Authority Exercised*

This factor covers the delegated supervisory and managerial authorities exercised on a recurring basis. To be credited with a level under this factor, a position must meet the authorities and responsibilities to the extent described for the specific level. Levels under this factor apply equally to the direction of specialized program management organizations, line functions, staff functions, and operating and support activities.

The agency credited Level 3-3a and 3-3b, but declined to credit Level 3-4. The appellant states the actual delegated managerial and supervisory authorities for this position meets the authorities listed at lower levels, as well as fully meets the criteria listed for Levels 3-4a and 3-4b.

A position is credited at Level 3-3 if it meets either Level 3-3a or 3-3b. At Level 3-3a, the position exercises delegated managerial authority to set a series of annual, multi-year, or similar types of long-range work plans and schedules for in-service or contracted work. The position assures implementation by lower and subordinate organizational units of the goals and objectives for the program segments or functions they oversee. The position determines goals and objectives which need additional emphasis; determines the best approach or solution for resolving budget shortages; and plans for long-range staffing needs, including such matters as whether to contract work. Positions in this situation are closely involved with high-level program officials or comparable agency-level staff personnel in the development of overall goals and objectives for assigned staff functions, programs, or program segments. For example, they direct development of data; provision of expertise and insights; securing of legal opinions; preparation of position papers or legislative proposals; and execution of comparable activities which support development of goals and objectives related to high levels of program management and development or formulation.

The appellant's position meets level 3-3a. Level 3-3a reflects the exercise of direct managerial authority and relates essentially to program management rather than supervisory functions. The appellant has significant authority in making decisions affecting the preservation, maintenance and reimbursable programs which he directs. As discussed previously, the appellant is responsible for the overall management, operation, and execution of business practices required to accomplish a reimbursable preservation project-services program offered nationally. As stated by his supervisor, he has been given "de facto" delegated authority for all aspects involving the reimbursable program including the planning, direction, execution, and development of long-range goals which support the NPS mission to reduce maintenance backlog.

Level 3-3b covers second-level supervisory positions which perform the full range of supervisory functions including at least eight of the conditions described at Level 3-3b. Our analysis of these responsibilities follows:



Responsibility 1 is credited. It involves using subordinate supervisors, leaders, team chiefs, group coordinators, committee chairs, or comparable personnel to direct, coordinate, or oversee work, or providing similar oversight of contractors. Through subordinate supervisors, the appellant directs a staff organized into four major functional subdivisions, and serves as first- and second-level supervisor in relation to these various segments.

Responsibility 2 is credited. It involves exercising significant responsibilities in dealing with officials of other units or organizations, or in advising management officials of higher rank. The appellant has significant coordinative advisory and public relations roles, both internal and external to the NPS.

Responsibility 3 is credited. It involves ensuring reasonable equity (among units, groups, teams, projects, etc.) of performance standards and rating techniques developed by subordinates, or ensuring comparable equity in the assessment by subordinates of the adequacy of contractor capabilities or completed work. The appellant carries out this responsibility in relation to the subordinate supervision in the four major functional subdivisions under his direction through his Deputy.

Responsibility 4 is credited. It involves directing a program or major program segment with significant resources (e.g., one at a multimillion dollar level of annual resources). The appellant exercises sole responsibility and distribution of all [Organization] reimbursement funding which exceeds \$7 million annually.

Responsibilities 5 and 6 are credited. They involve making decisions on work problems presented by subordinate supervisors, team leaders, or similar personnel, or by contractors, and evaluating subordinate supervisors or leaders, respectively. The appellant exercises this authority through his Deputy.

Responsibilities 7 and 8 are credited. They involve the authority to make or approve selections for non-supervisory positions, and recommending selections for subordinate supervisory positions. The appellant has the authority to make and approve selections for employees hired under the reimbursable program which he exercises through his Deputy.

Responsibility 9 is credited. It involves significant authority to hear and resolve group grievances or serious employee complaints. The appellant has authority to and has resolved such issues and complaints.

Responsibility 10 is not credited. It involves reviewing and approving serious disciplinary actions (e.g., suspensions) on non-supervisory employees. Although the appellant has authority to decide minor disciplinary actions, higher level managers must approve serious disciplinary actions.

Responsibility 11 is not credited. It involves making decisions on non-routine, costly, or controversial training request for employees of the unit. Although the authority to make decisions on training matters has been re-delegated to the Deputy, most decisions entailing controversial training and needs requests reside with the appellant's supervisor.

Responsibility 12 is credited. It involves determining whether contractor-performed work meets standards of adequacy necessary for authorization of payment. Although the appellant has the

authority to makes these determinations, the performance of contractor work has been re-delegated to subordinate personnel.

Responsibility 13 is credited. It involves approving expenses comparable to within-grades, extensive overtime, and employee travel. The appellant has the authority to make these determinations and exercises this authority through his Deputy.

Responsibility 14 is credited. It involves recommending awards for non-supervisory personnel and changes in position classification subject to higher level approval. The appellant has delegated authority to approve cash awards up to \$1000. In 2006, the appellant initiated classification reviews with NPS Headquarters' concurrence for positions up to the GS-14 level.

Responsibility 15 is credited. It involves funding and implementing ways to eliminate or reduce significant bottlenecks and barriers to production, promote team building, or improve business practices (e.g., a large production or processing unit). This would apply to large organizations whose mission would be susceptible to the application of such methodological or structural improvements. The work supervised by the appellant lends itself to these types of management applications.

Since the position can be credited with 13 of the listed responsibilities, it fully meets Level 3-3b.

As previously discussed, the agency believes the appellant's position doesn't meet the criteria for Level 3-4. The Agency Administrative Report (AAR) states the appellant does not approve multi-year or long-range work plans; execute final authority to approve allocation and distribution of funds; nor does he have final authority for the full range of personnel actions, organizational design, or proposals made by subordinate supervisors. Citing the appellant's supervisor's PD, the agency states his supervisor assists the training centers in the development of annual goals and multi-year, long-range plans for training center operational, staffing, contracting, and budgetary needs. The AAR states the appellant's supervisor recommends to the Assistant Director, Workforce Management (Human Capital Manager) the implementation of personnel actions, organizational design, and allocation of human and fiscal resources within and between centers. The AAR acknowledges some authorities are re-delegated to subordinate Training Center Superintendents (the Chief, Training will decide which ones) and other supervisors on their staff.

The appellant disagrees with the agency's rationale he does not meet the criteria for Level 3-4. The appellant states the AAR is not accurate when applied to his management and supervision of the non-appropriated, reimbursable [Organization] program and operation which his organization completes on an annual basis. He states the actual demands for the regular and recurring exercise of the authority necessary have been delegated to him as the [Organization] Superintendent to approve multi-year and long-range work plans, and he exercises sole responsibility and final authority to approve, allocate, and distribute all of the [Organization] reimbursement funding which on an annual basis now exceeds \$7,000,000. The appellant states the current and previous NPS practice has been for the [Organization] Superintendent to exercise the final authority for approval of all long-term strategies, plans, and goals for [Organization] operation and functions."

At Level 3-4, in addition to the delegated-managerial and supervisory authorities included at lower levels of this factor, the position must meet the criteria at either Level 3-4a or 3-4b.

Level 3-4a involves exercising delegated authority to oversee the overall planning, direction and execution of a program, several program segments, or comparable staff functions, including development, assignment, and higher level clearance of goals and objectives for supervisors or managers of subordinate-organizational units or lower organizational levels; approving multi-year and longer-range work plans developed by the supervisors or managers of subordinate units, and subsequently managing the overall work; overseeing the revision of long-range plans, goals, and objectives for the work directed; managing the development of policy changes in response to changes in level of appropriations or other legislated changes; managing organizational changes throughout the organization directed, or major change to the structure and content of the program; and exercising discretionary authority to approve the allocation and distribution of funds in the organization's budget.

The overall work directed by the appellant is designated as 20 percent training and 80 percent preservation services. The appellant agreed with the agency his managerial authority exercised on the non-reimbursable training and development programs of the [Organization] is limited. However, the record shows the primary mission of the [Organization] has become its reimbursable preservation and training services programs. The agency's rationale does not consider the significant independence and managerial authority the appellant has been given by his supervisor to operate the reimbursable program. As stated by the appellant's supervisor, the appellant has final authority to plan, direct, execute, and develop long-range goals for reimbursable preservation services. Most [Organization] employees are funded through reimbursable services, and the appellant has final hiring authority for these positions. In contrast, the few positions (e.g., the human resources and facilities management specialist positions) which are centrally (non-reimbursable) funded must be approved by the appellant's supervisor. The appellant has the responsibility and authority to commit resources for reimbursable preservation services, and enter into agreements and/or contracts with NPS units, state, local, and other Federal Government agencies. The record shows the appellant has approved multi-year plans developed by subordinate supervisors of [Organization], and he oversees revisions of long-range plans, goals, and objectives for work directed. Multi-year plans have included the National Cemetery Commission of the Veterans Administration's commissioned work to complete masonry deterioration of Cenotaphs. Therefore, we conclude the appellant has been permitted by higher-level agency management to exercise the authorities found at Level 3-4a on a regular and recurring basis and, thus, his position is properly credited at Level 3-4a and assigned 900 points.

#### Factor 4, *Personal Contacts*

This is a two-part factor which assesses the nature and the purpose of personal contacts related to supervisory and managerial responsibilities. The nature of the contacts, credited under Subfactor 4A, and the purpose of those contacts, credited under Subfactor 4B, must be based on the same contacts.

#### Subfactor 4A- Nature of Contacts

This subfactor covers the organizational relationships, authority or influence level, setting, and difficulty of preparation associated with making personal contacts involved in supervisory and managerial work. To be credited, the level of contacts must contribute to the successful performance of the work, be a recurring requirement, have a demonstrable impact on the difficulty and responsibility of the position, and require direct contact.

At Level 4A-3, frequent contacts are with key staff of public interest groups with significant political influence or media coverage, local officers of regional or national trade associations, public action groups, or professional organizations, and/or state and local government managers doing business with the agency.

Level 4A-3 is met. As the representative for the [Organization], the appellant's frequent contacts are with top-level officials including White House representatives, state park directors, mayors, congressmen, and other officials in state, local, and Federal agencies, and directors, superintendents, managers, supervisors, and employees at all levels within the NPS. Contacts also include officials from universities, colleges, private industry, contractors, public groups, international programs (i.e., as a representative at the International Preservation Trades Workshop), professional training societies, and have included officials from the National Cemetery Commission of the Veterans Administration. The appellant worked in partnership with the U. S. General Services Administration, and the mayor and city council of, [Location] for the lease and rehabilitation of an abandoned warehouse, which is presently the leased [Organization] Shop Facility. The appellant maintains he has continuing contacts with the mayor of [Location] concerning the structure. The appellant represents the agency and the [Organization] at professional conferences on national task-force assignments, or with service on national-professional committees.

Level 4A-4 is not met. At this level, frequent contacts are comparable to influential individuals or organized groups from outside the employing agency, such as executive-level contracting and other officials of major defense contractors, or national officers of employee organizations. These contacts may take place in meetings, conferences, briefings, speeches, presentations, or oversight hearings and may require *extemporaneous* response to unexpected or *hostile* questioning. The appellant does not have regular and recurring contacts with individuals of such stature and authority, and is not regularly engaged in the types of meetings and preparation for such meetings found at Level 4A-4.

This subfactor is credited at Level 4A-3 for 75 points.

#### Subfactor 4B- Purpose of Contacts

This subfactor covers the purpose of the personal contacts credited in Subfactor 4A, including the advisory, representational, negotiating, and commitment making responsibilities related to supervision and management.

Level 4B-3 is met. At this level, the purpose of contacts is to justify, defend, or negotiate in representing the project, program segment(s), or organizational units directed, in obtaining or committing resources, and in gaining compliance with established policies, regulations, or

contracts. As at this level, the appellant works in the local community, state-wide, and nationally to further the understanding, support and marketing of the [Organization's] mission, NPS's mission, and the Federal Government's mission through a variety of means including public-outreach programs, briefings, speeches and presentations. As previously discussed, frequency of the purpose of contacts are also for the negotiation of interagency agreements, cooperative agreements, and contracts to further the [Organization] reimbursable preservation-services program and the servicewide Training and Development Program.

Level 4B-4 is not met. At this level, the purpose is to influence, motivate, or persuade persons or groups to accept opinions or take actions related to advancing the fundamental goals or objectives of the program or segments directed, or involving the commitment or distribution of major resources, when intense opposition or resistance is encountered. Unlike this level, the persons contacted by the appellant are not usually fearful, skeptical, or uncooperative. Instead, the appellant's contacts take place in a structured environment established for the purpose of achieving goals common to the participants.

This subfactor is credited at Level 4B-3 for 100 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 directly or through subordinate supervisors, team leaders, or others. The level is determined by identifying the highest grade which best characterizes the nature of the basic (mission-oriented) non-supervisory/non-leader work performed or overseen by the organization directed, and which constitutes 25 percent or more of the workload of the organization.

The GSSG includes the workload of GS subordinates, Federal Wage System (FWS) employees, and student trainees. The GSSG excludes from consideration the work of lower level positions which primarily support or facilitate the basic work of the unit; any subordinate work graded on criteria in this guide (i.e., supervisory duties) or the Work Leader Grade Evaluation Guide and the FWS Job Grading Standard for Leaders; work graded on an extraordinary degree of independence from supervision, or personal research accomplishments; and work for which the supervisor or a subordinate does not exercise the level of supervisory responsibility needed to meet the threshold for credit under Factor 3.

For the appellant's organization, we eliminated the following positions from base-level consideration:

- Supervisory work performed by the Supervisory Exhibit Specialist, GS-808-14, Supervisory Exhibit Specialist, GS-808-13, and Supervisory Exhibit Specialist, GS-808-12, and work leader duties of the Mason Leader, WL-3603-10 and Wood Crafter WG-4604-10.
- Support work performed by the Management Assistant, GS-344-7, Office Automation Clerk, GS-303-5, Maintenance Worker, WG-4749-5, and Exhibit Student Trainee ,GS-1099-5, and GS-1099-4, positions are excluded from base

level determinations, since the result of the work of these positions *support* the accomplishment of the overall programs mission of the [Organization].

The appellant stated the Mason, WL-3603-10, and Wood Crafter (training leader), WG-4605-10, perform 100 percent leader duties; however, based on their official PDs, certified as current and accurate by competent-management authority, at least 50 percent of the time they are performing personally performed work. Working leaders in positions covered by the Job Grading Standard for Leader are non-supervisory workers who, in addition to the exercise of leader responsibility, perform regular non-supervisory (i.e., non-leader) trades and labor work as members of the work crews or groups they lead. Although the Mason, WL-3603-10, provides leadership duties on a regular and recurring basis, he also performs journeyman-level masonry work such as laying brick, block, tile, stone, and other similar materials in the maintenance, repair, alteration, or construction of partitions on projects assigned as needed to assure timely completion. Furthermore, even though the primary functions of the Wood Crafter (Training Leader), WG-4605-10, is to instruct/train the [Organization] Wood Crafting Team consisting of trainees and maintenance workers in the preservation trades, he also performs complex wood crafting duties to replicate or restore historic structures requiring a high degree of skill in working on complex preservation projects where more sophisticated wood-crafting skills are utilized.

Since the Mason WG-3610-10, Maintenance Mechanic, WG-4749-9, and Maintenance Worker, WG-4749-7, positions perform mission-essential work; these positions must be included for base-level purposes. We note the Preservation Specialist, WG-4701-9, position appears to be improperly titled and coded. As stated in the official PD, work performed by this position includes a variety of tasks including masonry, carpentry, woodcrafting, and roofing. This type of work is found in the WG-4749 occupational series, and the prescribed title for positions assigned to this series is Maintenance Mechanic. For purposes of this appeal, this position will be incorporated with the other Maintenance Mechanic, WG-4749-9, positions for base-level analysis.

The GSSG requires the conversion of FWS grades to their GS equivalent by comparing the duties performed to related GS classification standards. The appellant's organization has a number of manual labor and trades FWS jobs at various grade levels. The Mason, WG-3610-10, and the non-leader work of the Mason Leader, WL-3603-10, and Wood Crafter, WG-4605-10, carry out the highest level of non-supervisory FWS work.

While there is no direct correlation between GS and FWS grades, the level of work performed by the FWS grade 10 jobs does not exceed the level of work performed at the GS-7 grade level. For example, the complexity of work assignments, and the skills and knowledge of the Mason, WG-3610-10, and Wood Crafter, WG-4605-10, positions do not exceed the level of complexity of an Engineering Technician, GS-0802-7, position. This takes into consideration journey-level mason work involves the maintenance, repair, alteration, and construction of exterior surfaces and structures built on a variety of brick, block, and stone. Grade 10 masons work from oral instructions, blueprints, work orders, and rough sketches. They plan and lay out the work to be done, select the proper tools, determine materials to be used, and accomplish the work in accordance with appropriate methods and accepted-trade practices. They must have a comprehensive knowledge of techniques and procedures of brick, block, and stonework. They must have skill to perform decorative brickwork through the placement of brick of different colors to create various designs and patterns. Grade 10 wood crafters make and repair high-grade wooden items such as cabinetry, furniture, orthopedic devices, and decorative wood work

for use in homes, offices, planes, boats, ships, and for medical and other uses. These items have intricate, precise, and fancy features and details such as curved and contoured surfaces, marquetry, book-matched panels, scrollwork, friezes, inlays, and complex joints.

At the GS-7 level, engineering technicians perform work which involves planning non-routine assignments of substantial variety and complexity; selecting guidelines to resolve operational problems not fully covered by precedents; developing revisions to standard work methods; modifying parts, instruments, and equipment; and take actions to or make recommendations based on preliminary interpretation of data or results of analysis. For example, some Engineering Technicians, GS-802-7, review designated portions of plans submitted by contractors for interior electrical wiring of residential or office buildings for light and power; check the accuracy of calculations of loads, illuminations, conductor size, etc., and the adequacy of switches, controls, and other equipment selected by the contractor. They base their review on a practical knowledge of methods and techniques of electrical engineering design. They review drawings, the basis for design, and design analysis for conformance with established engineering standards and criteria set forth in manuals, codes, and other guides, and the specific project requirements. As discussed previously, the appellant's grade 10 subordinates exercise a comparable level of knowledge and skill in performing their trades and crafts work.

At the grade 10 level, masons receive work from supervisors either orally or through work orders. They review work to be performed, interpret blueprints or sketches, and decide work methods or processes best suited to complete the work. They perform their tasks independently, with little or no work direction. The finished work may be spot-checked for adequacy and adherence to accepted trade practices. In decorative work, they receive assignments as to end result desired and proceeds independently in outlining patterns and designs, determining methods and procedures, computing material, and accomplishing assigned tasks. At grade 10 wood crafters receive assignments through work orders, plans, specifications, sketches, and oral discussions. They lay out their work by interpreting plans and specifications or sketches; devising any needed plans and patterns; selecting appropriate combinations of materials, machines, accessories, processes, and techniques; and planning the complete sequence of work.

This level of responsibility compares closely with the recurring work assignments performed by Engineering Technicians, GS-802-7, whose work is occasionally observed and is subject to only occasional spot checks for technical adequacy. While the Mason, WG-3603-10, Wood Crafter, WG-4605-10, and Engineering Technician, GS-802-7, carry out their assignments within comparable types of established procedures, the overriding consideration is the level of complexity of the work performed. The comparison of the kind of assignments performed in these occupations demonstrate the grade 10 mason and grade 10 wood-crafter work is not inherently more complex than GS-7 engineering-technician work.

The appellant supervises grade 9 maintenance-mechanic work. At the grade 9 level, maintenance mechanics perform a variety of tasks involved in the upkeep of buildings, grounds and related structures, fixtures, and utilities. Typical work assignments include the visual examinations and operational tests to determine the need for, and the performance of, repair work on a level of difficulty and responsibility of trades such as a Painter, WG-4102-9, Plumber, WG-4206-9, and Carpenter, WG-4607-9. Recurring work assignments performed by grade 9 positions are conducted with independent judgment and decisions are within the framework of oral and written instructions and accepted trade practices, processes and procedures while completing assignments. This grade 9 level would not exceed the GS-802-6 work. Similar to grade 9 work, work assignments at the GS-6 involve carrying out non-routine

assignments of substantial variety and complexity. Engineering technicians at this level must apply a background of knowledge based on intensive training and diversified experience in the particular specialty field. GS-6 engineering technicians perform tests for which procedures have been developed but not completely standardized, requiring the selection and modification of test equipment and test procedures in accordance with test plans and programs developed by others. They apply and adapt a wide variety of established methods of computation and analysis under a variety of circumstances. Typical grade 9 maintenance-mechanic work would not meet the GS-7 level which requires knowledge of technical methods and procedures and knowledge of management practices and agency policy and programs to lay out, schedule, organize, and execute the details of a wide variety of types of limited operational projects incorporating diverse technical knowledges, e.g., to use dissimilar specialized methods, procedures and/or techniques, or one-at-a-time and often long-range multi-phased projects. Typical grade 9 maintenance-mechanic work performed requires knowledge and a skill to work within projects and plans developed by others.

Applying the same rationale to the other lower graded FWS positions, we conclude the representative FWS work performed does not provide a basis for crediting any work with a higher level than GS-6 credited to the grade 9 FWS work, as previously discussed.

The following listing shows the percentage of non-supervisory line work performed by the positions which includes the non-supervisory mission-oriented work performed by some of the supervisors and leaders for the base-level consideration. This listing also shows subordinate FWS positions with their adjusted GS-equivalent grades.

#### GS-13

Supervisory Exhibit Specialists, GS-1010 (30% non-supervisory duties)	.9
Architect, GS-808	1.0
Human Resources Specialist, GS-0201	1.0
Facilities Management Specialist, GS-1640	1.0

#### GS-12

Supervisory Exhibit Specialist, GS-1010 (30% non-supervisory duties)	.3
Exhibit Specialist, GS-1010	4.0
Contract Specialist, GS-1102-12	1.0

#### GS-11

Exhibit Specialist, GS-1010	17.0
IT Specialist, GS-2210	1.0
Budget Analyst, GS-560	1.0



GS-9

Construction Representative, GS-809	1.0
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GS-7

Mason Leader, WL-3603-10 (50% non-lead duties; adjusted grade)	.5
Wood Crafter, WG-4607-10 (50% non-lead duties; adjusted grade)	.5
Masonry Worker, WG-3603-10 (adjusted grade)	7.0

GS-6

Maintenance Mechanic, WG-4749-9 (adjusted grade)	15.0
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GS-5

Maintenance Mechanic, WG-4749-7	9.0
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Total staff years are 61.2 excluding supervisory/leader and support work.

GS-13:	6.37%
GS-12:	8.66%
GS-11:	31.05%
GS-9	.16%
GS-7:	13.07%
GS-6:	24.51%
GS-5	14.71%

The base level of work supervised by the appellant is GS-11, since work at or above this level constitutes 25 percent or more of the mission-oriented workload of the unit.

Level 5-6 is assigned for 800 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. To evaluate Factor 6, two steps are used. First, the highest level a position substantially meets is initially credited. Then, if the level selected is 6-1, 6-2, or 6-3, the Special Situations listed after the factor-level definitions are considered. If a position meets three or more of the situations, then a single level is added to the level selected in step 1. If the level selected under step 1 is 6-4, 6-5, or 6-6, the Special Situations may not be considered in determining whether a higher factor level is creditable.

The numbered paragraphs under Factor 6 are structured to address positions that function as either first-level or second- and higher-level supervisors and managers. The appellant's position

functions as a second- and higher-level supervisor as was discussed in our evaluation of Factors 3 and 5 of this decision over a GS-11 base level. This matches Level 6-5c which entails managing work through subordinate supervisors and/or contractors who each direct substantial workloads comparable to the GS-11 level. Such base work requires similar coordination as described at Level 6-4a for first-line supervisors. Given the externally oriented project nature of the organization's mission, discussed previously, entailing the integration of a wide variety of preservation and related skills, we find the coordinative demands described at Level 6-4a applicable to the appellant's situation.

Level 6-6 is not met. At this Level 6-6a, the supervision and oversight requires exceptional coordination and integration of a number of very important and complex program segments or programs of professional, scientific, technical, managerial, or administrative work comparable in difficulty to the GS-13 or higher level. Supervision and resource management at this level involves major decisions and actions which have a direct and substantial effect on the organizations and programs managed. For instance, supervisors at this level make recommendations and/or final decisions about many of the management areas listed under Factor Level 6-5a., or about other comparable areas. Since the base level of work directed by the appellant does not meet the GS-13 grade level, Level 6-6a is not met.

At Level 6-6b, the position manages through subordinate supervisors and/or contractors who each direct substantial workloads comparable to the GS-12 or higher level. Such base work requires similar coordination as that described at Factor Level 6-5a. Since the appellant's base level work is GS-11, Level 6-6b may not be credited.

Level 6-5 is assigned for 1225 points.

*Summary applying the GSSG*

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Program Scope and Effect	1-2	350
2. Organizational Setting	2-2	250
3. Supervisory and Managerial Authority Exercised	3-4a	900
4. Personal Contact		
Nature of Contacts	4A-3	75
Purpose of Contacts	4B-3	100
5. Difficulty of Work Directed	5-6	800
6. Other Conditions	6-5	1225

In accordance with the grade conversion table in the GSSG, a total of 3700 points falls within the point range of a GS-14.

*Summary*

Based on the above analysis, the position is properly classified as Supervisory Architect, GS-808-14.