

**U.S. Office of Personnel Management  
Classification Appeal Decision  
Under section 5112 of title 5, United States Code**

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

**Agency classification:** Public Affairs Specialist  
GS-1035-11

**Organization:** [Appellant's organization/location]  
Department of the Air Force

**OPM decision:** Public Affairs Specialist  
GS-1035-11

**OPM decision number:** C-1035-11-03

/s/ Linda Kazinetz for

\_\_\_\_\_  
Robert D. Hendler  
Classification and Pay Claims  
Program Manager  
Merit System Audit and Compliance

11/22/2011

\_\_\_\_\_  
Date

As provided in section 511.612 of title 5, Code of Federal Regulations (CFR), this decision constitutes a classification 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 5 CFR 511.605, 511.613, and 511.614, as cited in the *Introduction to the Position Classification Standards (Introduction)*, appendix 4, section G (address provided in appendix 4, section H).

**Decision sent to:**

[Appellant's name and address]

[Address of appellant's servicing human resources office]

Chief, Civilian Force Policy  
1040 AF Pentagon, AF-A1PC  
Washington, DC 20330

[Address of appellant's human resources office]

## **Introduction**

On June 23, 2011, the Atlanta Oversight office of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [name of appellant]. The appellant occupies a position currently classified as Public Affairs Specialist, GS-1035-11, in the [appellant's organization/location] Department of the Air Force (AF), [appellant's organization/location]. The appellant believes the position should be classified as Public Affairs Specialist, GS-1035-12. We received the complete agency administrative report on July 27, 2011 along with the appellant's comments and 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 interviews with the appellant on September 12 and 13, 2011, and with his/her immediate supervisor on September 14, 2011. We also conducted a telephone interview with his/her previous supervisor on September 15, 2011. In reaching our classification decision, we have carefully considered all of the information obtained from the interviews, as well as all other information of record provided by the appellant and his/her agency, including his/her official Air Force Core Personnel Document (CPD) [number].

## **Background**

Public Affairs Offices in organizations at [appellant's organization/location] were consolidated into one office under the "One Base, One PA" concept in May 2009. At that time, this position was established under the National Security Personnel System (NSPS) in the Team [name of location] Public Affairs Office as a Public Affairs Specialist, YA-02 position.

The appellant was assigned to the [name of unit and location], AFB as a Public Affairs Specialist GS-1035-11, when he/she applied and was selected for the YA-02 position in the Public Affairs Office. With the conversion of NSPS positions back to the General Schedule and based on his/her YA-02 NSPS position, he/she was converted to grade 11. In October 2010, the appellant submitted a classification appeal request to OPM in which he/she disagreed with the accuracy of his/her CPD and requested that the position be classified as a GS-1035-12. The appeal package was returned to his/her on October 14, 2010, based on the fact that classification appeal regulations state the accuracy of a CPD is not appealable. The position was then audited in April 2011 at [name of location] AFB resulting in a new CPD which certified the appellant's position as a Public Affairs Specialist, GS-1035-11. Both the appellant and his/her supervisor have certified to the accuracy of the new CPD. The appellant then submitted an appeal to OPM.

## **General issues**

The appellant makes various statements about the process used by his/her agency to classify his/her position, i.e., the audits of his/her position conducted by the agency in October 2009 and June 2010. In adjudicating this appeal, our responsibility is to make our own independent decision on the proper classification of this position. By law, we must make this decision solely by comparing his/her current duties and responsibilities to OPM position classification standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Therefore, we have considered the appellant's statements only insofar as they are relevant to making the comparison. Because our decision sets

aside all previous agency decisions, the classification practices used by the appellant's agency in classifying his/her position are not germane to the classification appeal process.

In his/her appeal rationale, the appellant stresses his/her role in acting for his/her supervisor in his absence. However, work performed in the absence of another employee cannot be considered in determining the grade of a position (*Introduction*, Section III.J., and *The Classifier's Handbook*, Chapter 5).

### **Position information**

The duty title of the appellant's position is Chief, Current Operations in the Team [appellant's organization/ location], Public Affairs Office. The appellant oversees the operations of all media and internal information activities in conducting a proactive installation-wide public affairs program designed to create mutual acceptance, respect, appreciation and cooperation between [name of location] AFB and the general public. Organizations serviced include the [name of organizations/locations of serviced agencies] units stationed at [name of location] AFB. The appellant directly oversees the internal information media relations programs that communicate agency policies, programs and actions, and informs the internal and external public about the mission, programs, and accomplishments of the installation. As discussed in the CPD of record, the appellant plans, develops, and executes communications, strategies and tactics for [name of location] AFB. He/she identifies communications needs, directs the development and implementation of programs and processes to meet those needs while synchronizing and integrating new and existing communication messages with those from higher headquarters.

The appellant represents [name of location] AFB with a variety of installation and functional area organizations and serves on occasion as the official [name of location] spokesperson to local, regional, and national community leaders and civic and defense related organizations, clarifying positions, providing information, and advocating [name of location] and AF programs and goals. In the absence of the Director, he/she represents the office in meetings/activities involving a variety of unit and functional area organizations, and local civilian and governmental entities. The appellant provides advice and assistance to employees, the supervisor, project officers, and commanders regarding ongoing public affairs matters. He/she plans and organizes a community relations program designed to promote positive relations between [name of location] AFB and its surrounding communities which include six chambers of commerce and eight military affairs committees. The appellant performs administrative and technical duties as a first-level supervisor. He/she assigns work to subordinates based on priorities, the difficulty of the work to be performed and the capabilities of employees.

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

The appellant does not question the series or title of his/her position or the use of the position classification standard (PCS) for the Public Affair Series, GS-1035, to evaluate his/her position and, based on the record, we concur. Although the appellant provides technical and administrative supervision to four personnel, this is not a major duty occupying at least 25 percent or more of his/her time, and as such the position cannot be considered supervisory for

titling or evaluation purposes. Therefore, the appellant's position is properly allocated as Public Affairs Specialist, GS-1035.

### **Grade determination**

The Public Affairs Series, GS-1035 PCS is written in the Factor Evaluation System (FES) format, under which factor levels and accompanying point values are to be assigned for each of the nine factors, with the total then being converted to a grade level by use of the grade-conversion table provided in the PCS. The factor point values mark the lower end of the ranges for the indicated factor levels. For a position to warrant a given point value, it must be fully equivalent to the overall intent of the selected factor level description. If the position fails in any significant aspect to meet a particular factor level description, the point value for the next lower factor level must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level.

The appellant disagrees with the evaluation of Factors 3, 4, 5, and 7, and agrees with his/her agency's crediting of Levels 1-7, 2-4, 6-3, 8-1 and 9-1. We reviewed carefully the levels assigned to the other factors by the agency and the accompanying rationale with which the appellant has not taken issue. We found those determinations to be appropriate for Factors 1, 2, 6, 8 and 9 and have so credited the position. Accordingly, our appeal analysis focuses on the evaluation of the remaining factors.

#### *Factor 3, Guidelines*

This factor covers the nature of guidelines and the judgment needed to apply them. Guides used in the Public Affairs Series include, for example: standard communication methods, practices and techniques, established agency policies and procedures, previously completed work and reference materials such as style manuals, publications or public affairs handbooks, standard texts on communication, and directories of print and broadcast media outlets. As discussed in the PCS, positions vary in the specificity, applicability and availability of the guidelines for performance of assignments. Consequently, the constraints and judgmental demands placed upon specialists vary. For example, the existence of specific procedures and policies may limit the opportunity of the public affairs specialist in making or recommending decisions or actions. However, in the absence of procedures or precedents or under broadly stated objectives, public affairs specialists may use considerable judgment developing new approaches in communicating agency programs to various publics. .

At Level 3-3 (275 points), guidelines include operating instructions, public affairs manuals, agency or local policies and regulations, and standard agency public affairs practices and precedents are readily available and generally applicable to situations encountered, although some gaps exist in specific areas. For routine work situations, the public affairs specialist independently selects, interprets and applies the guides, modifying and adapting them to suit specific situations not directly covered by the guidelines. In addition, the specialist is beginning to interpret and apply guidelines and precedents in some unusual situations without assistance from others.

The guidelines used by the appellant, and the latitude he/she has in working with them, matches Level 3-3. Guidance for the appellant's position includes [Appellant's organization and unit] regulations, policies, and plans, standard public affairs and public relations practices and universally accepted writing and stylebooks. Air Instruction, AFI 35 -101 provides detailed guidance and guidelines for all AF military and civilian public affairs personnel and is the primary governing regulation for [name of location] AFB Public Affairs. It specifically addresses installations that have a consolidated Public Affairs Office and covers communication objectives, messages and plans. The appellant uses this guidance in developing communications plans as needed for new initiatives such as the rollout of the F-35 Fighter. These plans include policies on timing, types of media, interviews, and messages as well as involvement in developing and releasing information on controversial and sensitive issues.

The position does not meet Level 3-4 (450 points). At this level, guidelines are agency policy statements or broad precedents and are applicable in establishing a general program direction or setting a tone but not totally sufficient for dealing specifically with the more complex, intricate or unusual situations, issues or problems encountered on a recurring basis. The employee must deviate from standard approaches in developing new ways to communicate the agency's message on controversial and sensitive issues where public reaction has been negative or indifferent and understanding by agency publics of information programs is essential to success of the agency mission. As stated in the FES Primary Standard, the "standard-for-standards" for the FES, guidelines for performing the work at Level 3-4 are scarce and of limited use. Work requires deviating from traditional methods or researching trends and patterns to develop new methods, criteria, or proposed new policies.

DoD and AF regulations and policy issuances provide detailed instructions for dealing with most situations, issues or problems. Only on rare occasions is the appellant involved in communicating the agency's message on controversial and sensitive issues. The appellant claims that guidelines should have been considered at Level 3-4 in that he/she sets guidelines for the internal and media decisions of the office he/she supervises and constantly ensures the entire office adheres to the guidelines as it makes determinations on how the office will support the multiple organizations at [name of location]. Level 3-4 contemplates substantially deviating from, or significantly changing and extending established approaches and methods in the occupation. The examples provided by the appellant show he/she ensures the staff adheres to DoD and AF guidelines and does not show he/she operates with the dearth of guidelines envisioned at Level 3-4.

Level 3-3 is credited for 275 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 (225 points) the work requires the application of advanced communication and analytical practices, methods and techniques to the solution of complex public affairs problems such as developing and presenting informational material to achieve an understanding of various

points of view or concepts from publics with varying levels of understanding and different interests and perspectives on the subjects; employing a number of information gathering techniques in collecting and analyzing public reaction to information programs; and developing recommendations for management in improving the agency's communication with the general public and specialized groups.

Decisions regarding what needs to be done are based upon an analysis of the need for modifying standard communication practices and approaches such as analyzing the reaction to information programs from a variety of groups having different interests and goals from the agency; determining the feasibility of using various information gathering techniques in obtaining a reaction from agency publics and evaluating the effect of various information program approaches to the development of communication interchanges with agency publics.

The work requires making decisions on which of a variety of oral and written communication methods and approaches to employ in presenting and explaining programs and policies in a logical and clarifying manner, in a structured setting, in achieving an understanding from the agency's publics, some with differing interests, on the programs or policies advocated by the agency.

The complexity of the appellant's work is comparable to Level 4-4. The appellant plans, develops, and executes communication strategies for [name of location] AFB. He/she develops and provides informational material to the public, local television (TV), and newspapers and has some involvement with the national media. He/she also interacts with local media including newspapers and TV stations by responding to reporters' questions. He/she provides advice and assistance on public affairs activities to his/her employees, his/her supervisor, and commanders of organizations on [name of location] AFB. The appellant indicates that he/she provides input on almost every office decision involving the development of new methods, strategies and communication plans covering the complete spectrum of the organization's programs. He/she attends organization staff meetings and provides advice to commanders and staff on the implementation of Public Affairs policies.

At Level 4-5 (325 points), the work includes developing new methods, strategies and communication plans covering the complete spectrum of the organization's programs. This involves: presenting information on a wide variety of subjects using the full array of written and oral presentation formats and techniques; establishing and maintaining effective working relationships in achieving an understanding with groups indifferent to or having opposing points of view to programs and policies; and developing, from an analysis of varied and conflicting reactions from the agency's publics, recommendations on the formulation and articulation of agency policy in communicating agency programs more effectively.

Decisions regarding what needs to be done include evaluating the appropriateness of existing strategies and plans in light of changes in program emphasis or content including statutory or technological changes, and shifts in public reaction to or understanding of the programs. The work requires developing new ways of gathering input from a variety of individuals and groups with conflicting views and interests, and developing and initiating varied approaches and strategies in communicating the agency's objectives to groups opposed or indifferent to agency

programs. The position does not meet Level 4-5. While involved in developing limited communication plans and strategies for tenant organizations, he/she is not responsible for developing a comprehensive communication plan for the base. Communications plans do not cover the complete spectrum of the organizations programs since public affairs responsibilities are shared between the appellant and three other Public Affairs Specialists in the office. Work at this level in the appellant's organization is vested in his/her supervisor's position whose CPD ([number]) states the incumbent plans, organizes and oversees the activities of the base public affairs office; develops goals and objectives that integrate organization and public affairs objectives; establishes, revises or reviews policies, procedures, mission objectives, and organization design for staff; and provides subordinate supervisors and staff with direction and advice regarding policies, procedures and guidelines.

Level 4-4 is credited for 225 points

*Factor 5, Scope and Effect*

This factor covers the relationship between the nature of the work, i.e., the purpose, breadth, and depth of the assignment, and the effect of work products or services both within and outside the organization. In the Public Affairs Series, effect measures such things as whether the work output facilitates the work of others, provides timely services of a personal nature, or impacts on the achievement of program objectives. The concept of effect alone does not provide sufficient information to properly understand and evaluate the impact of the position. The scope of the work completes the picture, allowing consistent evaluations. Only the effect of properly performed work is to be considered.

At Level 5-3 (150 points) the work involves performing duties of a recurring nature in dealing with precedented public affairs matters such as responding to media questions on standard agency policies, explaining the benefits of program-developed research to interested groups, or developing parts of a communication plan for an organization. The work affects the development or operation of the organization's communication plan or impacts the social or economic well-being of individuals served or affected by agency programs or policies.

The scope and effect of the appellant's work match Level 5-3. His/her duties are primarily of a recurring nature in providing responses to media requests from local TV stations and newspapers as well as periodic requests from national publications. He/she has developed communication strategies and plans for organizations located on [name of location] AFB as well as for special events taking place on the base. He/she serves as an advisor on public affairs matters to commanders of tenant organizations at [name of location] AFB. He/she has been involved with developing a communication plan for the rollout of the F-35 Joint Strike Fighter and is the Public Affairs point of contact for press inquiries concerning the Joint Strike Fighter.

At Level 5-4 (225 points) the purpose of the work is the development of complete communication plans for an organization and provision to program officials of advisory, planning, and technical services in designing approaches resolving public affairs problems in various program areas. The work contributes to the achievement of program objectives by



clarifying the issues and alternatives facing agency managers in achieving a meaningful communication between the agency and the various publics affected by its programs or policies.

The position does not meet Level 5-4. While the appellant has developed communication plans for special projects, he/she has not been responsible for the development of a complete communication plan for the base. The scope of his/her duties does not meet Level 5-4 in that as Operations Chief he/she is responsible for media and internal affairs while other Public Affairs Specialists in the office are responsible for Environmental Public Affairs, Civic Outreach, and Security and Policy Review. As discussed previously, the appellant's supervisor is vested with responsibility for the overall base communication plan.

Level 5-3 is credited for 150 points

*Factor 7, Purpose of Contacts*

This factor covers the purpose of personal contacts which range from factual exchange of information in situations involving significant or controversial issues and differing viewpoints.

At Level 7-2 (50 points), the purpose of contacts is to coordinate activities or plans with management officials, other public affairs specialists, contractors, groups or individuals sharing the same goals and interests as the public affairs specialist; or advise program managers on techniques to use in disseminating or collecting information; or present analyses of factual information used in developing strategies for communicating agency policies and programs.

The purpose of the appellant's contacts is consistent with Factor Level 2. The appellant coordinates plans and activities with the media through contacts with local TV stations and newspapers as well as periodic contacts with national media. He/she also serves as an advisor to tenant organizations at [name of location] AFB on public affairs matters and coordinates the information placed on media internal to [name of location] AFB.

The position does not meet Level 7-3 (120 points). At that level the purpose of contacts is to analyze, develop and present alternative approaches in developing communication strategies for misunderstood agency policies or programs; or present clarifications of agency activities or policies to specialized groups, the general population, industrial organizations, representatives of the news media, or individuals. While the appellant is called to periodically provide information to the public or the media concerning controversial matters, this level presupposes that there are continuing or recurring controversies or misunderstandings on the part of the various public related to the agency's activities that the public affairs specialist would be charged with resolving. While the appellant provides Public Affairs Office input to controversial matters, the responsibility for researching, determining or recommending appropriate actions or interpretation of issues that impact organizations, the installation, or commands lies with the appellant's supervisor.

Level 7-2 is credited for 50 points.

*Summary*

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge Required by the Position	1-7	1,250
2. Supervisory Controls	2-4	450
3. Guidelines	3-3	275
4. Complexity	4-4	225
5. Scope and Effect	5-3	150
6. Personal Contacts	6-3	60
7. Purpose of Contacts	7-2	50
8. Physical Demands	8-1	5
9. Work Environment	9-1	<u>5</u>
<i>Total Points</i>		2,470

The total of 2,470 points falls within the GS-11 range (2,355 – 2,750) on the PCS's grade conversion table.

**Decision**

The appellant's position is properly classified as a Public Affairs Specialist, GS-1035-11.