

U.S. Office of Personnel Management
Office of Merit Systems Oversight and Effectiveness
Classification Appeals and ELSA Programs



San Francisco Oversight Division
120 Howard Street, Room 760
San Francisco, CA 94105

**Classification Appeal Decision
Under Section 5112 of Title 5, United States Code**

Appellants: [appellant's name]
[co-appellant's name]

Agency classification: Geographic Information Systems Specialist
GS-301-9

Organization: [appellant's organization]
Bureau of Land Management
U.S. Department of the Interior

OPM decision: GS-301-9
title at agency discretion

OPM decision number: C-0301-09-02

Signed by Denis J. Whitebook _____
Denis J. Whitebook
Classification Appeals Officer

February 5, 1998 _____
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’s name and address]

[name and address of appellants’ servicing personnel office]

[co-appellant’s name and address]

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Introduction

On September 8 and 29, 1997, the San Francisco Oversight Division of the U.S. Office of Personnel Management (OPM) received classification appeals from [the appellants]. Their positions are currently classified as Geographic Information Specialists GS-301-9. However, they believe their positions should be classified at the GS-11 level. They work in [a unit, district, State Office], Bureau of Land Management, U.S. Department of the Interior, [in a city and state]. [An appellant's] duty station is [in the city] and [the co-appellant's] is [in a town]. We have accepted and decided their appeal under section 5112 of title 5, United States Code (U.S.C.).

General issues

The appellants compare their positions to higher graded positions that they believe are similar. 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, and 5112). Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellants' positions to others as a basis for deciding their appeal.

Like OPM, the appellants' agency must classify positions based on comparison to OPM standards and guidelines. However, the agency also has primary responsibility for ensuring that its positions are classified consistently with OPM appeal decisions. If the appellants consider their positions so similar to others that they all warrant the same classification, they may pursue the matter by writing to their personnel office. In doing so, they should specify the precise organizational location, classification, duties, and responsibilities of the positions in question. If the positions are found to be basically the same as theirs, the agency must correct their classification to be consistent with this appeal decision. Otherwise, the agency should explain to them the differences between their positions and the others.

In reaching our classification decision, we have carefully reviewed all information furnished by the appellants and their agency, including their official position description (PD) [number].

Position information

The appellants' PD indicates that the appellants provide coordination and support to resource specialists, planners, and managers who use the district Geographic Information System (GIS) for resource planning and project management. The appellants receive broad and sometimes vague requirements from varied resource specialists and managers. They provide guidance and assistance in organizing, analyzing, locating, and evaluating a wide range of information. They coordinate with the State Office divisions, other offices, and other Federal and State land managing agencies for effective direction for GIS data base compilation and overall data administration and management. The appellants work with the Organization Information Resources Management Coordinator (IRMC) to ensure that all Organization GIS hardware requirements are fulfilled, either by the IRMC or the appellants. An example of the type of project for which they provide GIS support is the Tristate Noxious Weed Project (a five-year project). The resources team will set up monitoring sites to

measure weed encroachment and its effects. The study will result in recommendations and decisions that will affect livestock practices, compliance with environmental regulations, etc.

The following is a summary of the appellants' description of the initial project evaluation process they accomplish. The appellants ask the resources team the following questions to determine user needs and project objectives: What is the problem to be solved; how is the problem solved now; what are the geographic boundaries; are other Federal, State, or other organizations involved in the project; are there other uses for the data and what are the specific requirements; what is the duration of the project; what will the final products be (e.g., reports, graphic displays); who is the intended audience (i.e., technicians, resource specialists, planners, managers, the general public); is the information to be used for litigation purposes; and what is the project deadline? Based on the above information, the appellants determine the number and type of geographic data layers by the complexity of the problem to be solved and the project's geographic boundaries. The appellants develop a list of geographic data layers needed for the project, query the district GIS for available data layers meeting the project objectives, research the availability of additional geographic data layers needed and their compatibility with the current GIS platform, and recommend another form of data (Global Positioning System, remote sensing, digital line graphs, etc.) if existing geographic data is not available. They select existing tabular data bases and determine compatibility with geographic data bases. If they identify a need for new tabular data bases, they design and structure the data bases for integration into or linking to existing data bases. The appellants evaluate alternative scenarios and make minor revisions. This process requires the appellants to evaluate existing data models and determine if they meet the project objectives, identify and design new data models, design the proper sequence data will be processed, and research and evaluate new or different applications in terms of project objectives. The appellants prepare a project evaluation report outlining alternative approaches for the portrayal of the different types of data and cost figures for each alternative. For instance, they may recommend contracting the digitizing of additional layers based on an analysis of the cost of additional staffing, equipment needs, and project deadlines.

The PD and other information furnished by the appellants and their agency provide additional details about the positions' duties and responsibilities and how they are carried out.

Series determination

The appellants' PD indicates that these positions require a knowledge of geographic and cartographic sciences, interdisciplinary resource management or natural resource management, data base management, and geographic systems and land information systems. These positions are a mix of duties and responsibilities which are not covered by any one occupation. Such positions are best matched to the Miscellaneous Administration and Program Series GS-301 when the primary duties are to perform nonprofessional, two-grade interval work for which no other series is appropriate. The GS-301 work requires analytical ability, judgment, discretion, and knowledge of a substantial body of administrative or program principles, concepts, policies, and objectives. The appellants' positions are best matched to the GS-301 series and neither the agency nor the appellants disagree.

Title determination

The appellants' positions are best placed in the GS-301 series. OPM has prescribed no titles for positions in that series. Therefore, according to section III.H.2 of the Introduction to the Position Classification Standards, the appellants' agency may choose the official title for their positions. In doing so, the agency should follow the titling guidance in that section.

Standard determination

There is no standard or guide that is directly applicable to the appellants' positions. In such cases, according to pages 20-21 of the Introduction to the Position Classification Standards, the positions are to be evaluated by reference to an appropriate general classification guide or criteria in a standard(s) for related kinds of work. In using other standards, the criteria selected as the basis for comparison should be for a kind of work as similar as possible to the position to be evaluated with respect to: the kind of work processes, functions, or subject matter of work performed, the qualifications required to do the work, the level of difficulty and responsibility, and the combination of classification factors which have the greatest influence on the grade level.

In its May 23, 1997 appeal decision, the Bureau evaluated the appellants' positions by application of the Administrative Analysis Grade-Evaluation Guide. The appellants reviewed the Administrative Analysis Grade-Evaluation Guide (hereinafter referred to as the Guide) and the standard for the Computer Specialist Series GS-334. They believe that since the bulk of their positions involves the application of analytical, evaluation, and management principles to adapt computer methods to a variety of subject-matter situations, the GS-334 standard may be the appropriate classification reference. They believe either would support an upgrade, but they believe that the GS-334 standard is a better match.

The Guide provides grade level criteria for nonsupervisory staff administrative analytical, planning, and evaluative work. Work covered by the Guide is administrative in nature and does not require specialized subject matter knowledges and skills. While such work does not require specialized educational preparation, it does require a high degree of qualitative and/or quantitative analytical skills, the ability to research problems and issues, written and oral communication skills, and the application of mature judgment in problem solving.

The GS-334 series covers work which includes responsibility for analyzing, managing, supervising, or performing work necessary to plan, design, develop, acquire, document, test, implement, integrate, maintain, or modify systems for solving problems or accomplishing work processes by using computers. Positions are included in the GS-334 series when the primary need is knowledge of information processing methodology/technology, computer capabilities, and processing techniques.

Since the GS-334 standard and the Guide both cover two-grade interval work and use the Factor Evaluation System, the level of difficulty and responsibility and the combination of classification factors are treated essentially the same in the grade-evaluation criteria. However, the GS-334 grade-

evaluation criteria are specifically designed to evaluate computer specialist work where the primary qualification is knowledge of information processing methodology/technology, computer capabilities, and processing techniques. In contrast, the appellants' PD reflects that the positions require knowledge of geographic/cartographic sciences, interdisciplinary resource management or natural resource management, data base management, and geographic information systems/land information systems. The appellants' positions require knowledge of the interrelationship of the various natural resources (e.g., forestry, fisheries) and of the GIS and land information systems in order to produce an analysis useful to the natural resource specialists, planners, and managers. The appellants' positions are not responsible for developing the GIS or its software which would be a computer specialist's responsibility. The appellants' positions are not responsible for analyzing the geographic data produced by the appellants' positions. The analysis of the geographic data as it applies to the resource problem or project is the responsibility of the resource specialists, planners, and managers. The appellants' positions provide staff administrative analytical, planning, and evaluative work in support of the resource specialists, planners, and managers. These functions are more comparable to those covered by the Guide than to the computer specialist functions covered by the GS-334 standard. In addition, their work does not have as a primary qualification knowledge of information processing methodology/technology, computer capabilities, and processing techniques as does GS-334 work. The appellants' work is best evaluated by reference to the more general criteria found in the Guide rather than the more specific computer specialist grade-evaluation criteria found in the GS-334 standard.

Grade determination

The Administrative Analysis Grade-Evaluation Guide uses the Factor Evaluation System (FES), which employs nine factors. Under the FES, each factor level description in a standard describes the minimum characteristics needed to receive credit for the described level. Therefore, 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. Conversely, the position may exceed those criteria in some aspects and still not be credited at a higher level. Our evaluation with respect to the nine FES factors follows.

Factor 1, Knowledge required by the position -- Level 1-6 -- 950 points

This factor measures the nature and extent of information or facts that a worker 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 this knowledge. To be used as a basis for selecting a level under this factor, a knowledge must be required and applied. The Bureau evaluated this factor at Level 1-6 and the appellants believe it should be evaluated at Level 1-7.

- Level 1-6 is the level of knowledge appropriate for analytical and evaluative positions at the first full-performance level. Positions with this level of knowledge require skill in applying analytical and evaluative techniques to the identification, consideration, and resolution of issues or problems of a procedural or factual nature. Included at this level is a knowledge of the theory and principles of management and organization including

administrative practices and procedures common to organizations, such as those pertaining to areas of responsibility, channels of communication, delegation of authority, etc. Assignments typically involve using qualitative and quantitative analysis techniques and require skill in conducting interviews with supervisors and employees.

- In addition to knowledge at the previous level, assignments at Level 1-7 require knowledge and skill in applying analytical and evaluative methods and techniques to issues or studies concerning the efficiency and effectiveness of program operations carried out by administrative or professional personnel, or substantive administrative support functions (i.e., internal activities or functions such as supply, budget, procurement, or personnel which serve to facilitate line or program operations). This level includes knowledge of pertinent laws, regulations, policies, and precedents which affect the use of program and related support resources (people, money, or equipment) in the area studied. The assignments require knowledge and skill in adapting analytical techniques and evaluation criteria to the measurement and improvement of program effectiveness. Knowledge is applied in developing new or modified work methods, procedures for administering program services, guidelines and procedures, and automating work processes.

Comparable to Level 1-6, the appellants' description of their project evaluation work (summarized on page 2 above) demonstrates that their positions require skill in applying analytical and evaluative techniques in identifying, considering, and resolving issues and problems of a procedural or factual nature (e.g., identifying the required geographic data, its availability, its compatibility with the GIS platform). Their PD reflects that their positions require a knowledge of geographic and cartographic sciences, interdisciplinary resource management or natural resource management, data base management, and geographic information systems and land information systems in order to support resource projects and manage and administer the GIS. This level of knowledge is comparable to Level 1-6 which describes knowledge of the theory and principles of management and organization including administrative practices and procedures common to organizations. The appellants' assignments also require skill in communicating with resource teams, planners, and managers about the project objectives and data requirements and with other employees about the technical aspects of the GIS (e.g., data availability, data compatibility). This is comparable to Level 1-6 where the assignments require skill in conducting interviews to obtain information about organizational missions, functions, and work procedures.

In our judgment, the appellants' project and GIS coordination and management work do not require a level of knowledge comparable to Level 1-7. The appellants must have a detailed knowledge of the district GIS in order to develop geographic data in support of district resource projects. However, we do not consider this work comparable to Level 1-7 where the assignments require knowledge and skill in applying analytical and evaluative methods and techniques to issues or studies *concerning the efficiency and effectiveness of program operations* carried out by professional personnel. For example, at Level 1-7, the employee conducts studies to analyze and measure the effectiveness, efficiency, and productivity of substantive operating programs (e.g., weapons testing or commodity management) which requires knowledge of the mission, organization, and work

processes or programs throughout a military command, complex multi-mission local installation, or equivalent. The appellants assignments are not concerned with the effectiveness, efficiency, and productivity of the Bureau's or State Office's GIS. Their assignments are concerned with supporting individual resource projects at the district level which is comparable to Level 1-6 assignments.

The appellants perform other duties that they believe require a knowledge level equivalent to Level 1-7. These are addressed as follows:

- The appellants meet with employees of other Federal, State, local, and private organizations to discuss ways to share GIS technologies; however, this is not comparable to conducting a study of a program operation as envisaged at Level 1-7.
- The appellants also are responsible for updating and preparing the organization's GIS needs analysis, GIS implementation plan, GIS related life cycle management documents, and the GIS portion of the information resource management and five-year acquisition plan. These plans would require a knowledge of the mission, organization, and work processes at the district level; however, such work would not require knowledge of the mission, organization, and work processes throughout the Bureau or State Office as envisaged at Level 1-7.
- The appellants provide user training to ensure users are familiar with the working and capabilities of GIS hardware and application software which includes: what materials are suitable for storage and display on the GIS, how to prepare materials for data entry, use of GIS hardware and software, most effective analytical uses of GIS application software, and data standards and data acquisition requirements and methods. This user training covers factual or procedural areas of the GIS comparable to Level 1-6. The user training does not cover difficult and complex subjects equivalent to a study requiring a knowledge of the mission, organization, and work processes throughout the Bureau or State Office as envisaged at Level 1-7.
- The appellants also provide user support and troubleshooting assistance for problems related to GIS hardware and application software and prepare digitizing/data acquisition contract specifications. The appellants are responding to specific problems or projects in carrying out these duties. These duties do not demonstrate a knowledge level equivalent to Level 1-7 where, for example, the employee would study the effectiveness, efficiency, or productivity of a program requiring a knowledge of the mission, organization, and work processes throughout the Bureau or State Office as envisaged at Level 1-7.

The knowledge level required of the appellants' positions meets Level 1-6, but falls short of Level 1-7. This factor is evaluated at Level 1-6 and 950 points are credited.

Factor 2, Supervisory controls -- Level 2-3 -- 275 points

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility, and the review of the completed work. The Bureau evaluated this factor at Level 2-3 and the appellants believe that it should be evaluated at Level 2-5.

Level 2-5 is the highest level described in the FES format and is typical of positions at the GS-14 and GS-15 level. Level 2-5 covers positions where the employee is a recognized authority, subject only to administrative and policy direction. Level 2-5 employees are assigned major projects which are reviewed by management officials for potential influence on broad agency policy objectives. The appellants perform district level assignments which do not influence broad agency (i.e., department or bureau level) policy objectives. The appellants's positions do not meet Level 2-5.

The appellants' positions do not meet the threshold criteria for Level 2-4. At Level 2-4, the projects are of such scope that the supervisor and employee must determine, in consultation, an acceptable project plan which identifies the work to be done, the scope of the project, deadlines, and the resources (e.g., funds, staff) needed for its accomplishment. There is no evidence that the appellants' projects are of comparable scope.

The appellants' positions meet and exceed the threshold criteria for Level 2-3. At Level 2-3, the supervisor assigns specific projects in terms of objectives, priorities, and deadlines; the employee plans and carries out successive steps of fact-finding and analysis of issues to complete each phase of the assigned projects; and the work is reviewed for conformance with overall requirements as well as contribution to the objectives of the study. The appellants' supervisor specifies broad objectives and scope. The appellants function with a large degree of independence in coordinating, scheduling, reporting, and completing assigned tasks and duties. Their completed work is reviewed to ascertain accomplishment of objectives.

The appellants' positions meet and exceed Level 2-3, but fall short of the Level 2-4 threshold criteria. This factor is evaluated at Level 2-3 and 275 points are credited.

Factor 3, Guidelines -- Level 3-3 -- 275 points

This factor covers the nature of the guidelines and the judgment needed to apply them. The Bureau evaluated this factor at Level 3-3 and the appellants agree.

Comparable to Level 3-3 on page 12 of the Guide, the appellants' guidelines are Bureau manuals, written instructions, and work plan directives which set forth policies, regulations, and procedures for resource management and the State-level GIS implementation plan and data transition plan. The appellants must use their judgment in adapting these guidelines since they are not always directly applicable to the specific assignment. The appellants' guidelines do not match Level 3-4 where the guidelines consist of management and organizational theories which require considerable adaptation or interpretation to the issues or problems studied. This factor is evaluated at Level 3-3 and 275 points are credited.

Factor 4, Complexity -- Level 4-3 -- 150 points

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. The Bureau evaluated this factor at Level 4-3 and the appellants believe their positions meet Level 4-4.

- At Level 4-3, the work principally involves dealing with problems and relationships of a procedural nature rather than the substance of work operations, issues, or other subjects studied. The employee analyzes the issues, then selects and applies accepted analytical techniques to the resolution of procedural problems. Projects take place within an organization with related functions and objectives, although organization and work procedures differ from one assignment to the next. Typically, the employee prepares a report containing a statement of the issue or problem, background, observations, options for change, and recommendations for action. Findings and recommendations are based upon analysis of work observations, review of records or similar documentation, research of precedent studies, and application of standard administrative guidelines.
- In addition to improving conditions of a procedural nature, the work at Level 4-4 involves gathering information, identifying and analyzing issues, and developing recommendations to resolve substantive problems of effectiveness and efficiency of work operations in a program or program support setting. Information about the subject is often conflicting or incomplete, cannot readily be obtained by direct means, or is otherwise difficult to document. This work requires the application of qualitative and quantitative analytical techniques that frequently require modification to fit a wider range of variables.

The appellants' work involves various duties related to the use of GIS data. They receive geographic data requests from various resource specialists and managers. After analyzing the request, they select the appropriate data bases, coordinate with other data base managers to obtain necessary data, or coordinate and provide technical direction for data preparation and entry for the resource specialists and managers who use the data in preparing resource management plans. They manage the organization GIS program by maintaining interface between the specific project schedule needs, the data entry/digitizing activities, and the end user products and data base maintenance.

This work meets Level 4-3 where the employee analyzes the issue and selects and applies accepted analytical techniques to resolve the problem. The appellants develop alternative options for obtaining data which is comparable to Level 4-3 where the employee prepares a report stating the issue, observations, options for change, and recommendations for action. The GIS projects take place in the district which has related functions and objectives as described at Level 4-3.

We can find no evidence (such as specific work examples occupying the majority of each appellant's time) that support finding that the information about the subject is often conflicting or incomplete, cannot readily be obtained by direct means, or is otherwise difficult to document. We can also find

no evidence in the record that existing work methods and techniques for application to the analysis of specific issues or problems were refined or modified as described at Level 4-4 on pages 14-15 of the Guide. The appellants' work does not meet the threshold criteria for Level 4-4; therefore, this factor is evaluated at Level 4-3 and 150 points are credited.

Factor 5, Scope and effect -- Level 5-3 -- 150 points

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. The Bureau evaluated this factor at Level 5-3 and the appellants believe it should be evaluated at Level 5-4.

The appellants' PD states that the technical expertise, the ability to work as a team member, and the critical work performed by the appellants will directly affect the ability of Bureau managers to respond to land management requirements. The PD states that the Bureau GIS data bases compiled and coordinated by the appellants will be used to assist Bureau managers in their functional responsibilities. The appellants state that the purpose their work is to manage, coordinate, and direct data preparation, entry, analysis, and maintenance of the GIS data bases which are used by a diverse group of resource specialists, planners, and managers in preparing resource management plans and activity plans which directly affect the management of public lands.

- The purpose of work at Level 5-3 is to plan and carry out projects which involve identifying, analyzing, and making recommendations to resolve conventional problems and situations. Employees may be assigned portions of broader studies. The completed work influences decision by managers concerning the activities studied.
- The purpose of work at Level 5-4 is to assess the productivity, effectiveness, and efficiency of program operations. The work involves establishing criteria. The work may involve promulgating program guidance for application across organizational lines or in varied geographic locations. The work contributes to the improvement of productivity, effectiveness, and efficiency in program operations at different echelons or geographical locations within the organization. The work affects the plans, goals, and effectiveness of missions and programs at these various echelons or locations.

The purpose of the appellants' positions is to carry out a portion of broader resource management projects comparable to Level 5-3. The appellants' positions are responsible for data preparation, entry, analysis, and maintenance of the GIS data bases which are used by resource specialists, planners, and managers to develop resource management plans and activity plans for the management of district resources. The scope and effect of the appellants' positions does not meet the threshold for Level 5-4 as their work does not involve the establishment of criteria for application across organizational or Bureau lines or in geographic locations outside their district. Their work does not affect a wide range of Bureau activities as envisaged at Level 5-4. This factor is evaluated at Level 5-3 and 150 points are credited.

Factor 6, Personal contacts & Factor 7, Purpose of contacts -- Level 6-2 & Level 7-b -- 75 points

Persons contacted

This factor includes face-to-face contacts and telephone and radio dialogue with persons not in the supervisory chain. The Bureau evaluated this factor at Level 2 and the appellants believe their positions meet Level 3.

- At Level 2 persons contacted are employees, supervisors, and managers of the same agency, but outside of the immediate office, or employees and representatives of private concerns in a moderately structured setting.
- At Level 3 persons contacted are persons outside the agency which may include consultants, contractors, or business executives in a moderately unstructured setting. This level may also include contacts with the head of the employing agency or program officials several managerial levels removed from the employee when such contacts occur on an *ad hoc* basis.

Comparable to Level 2, the appellants' official PD states that their contacts are with GIS users and subject matter specialists within the Organization and the State Office, State Office GIS Operations staff, and other agency GIS Specialists and Managers.

In addition, the appellants state that they regularly meet with employees of other Federal agencies, State and local governments, and private organizations for the purpose of sharing GIS technology, discussing ways to share GIS technologies, reducing duplication of efforts through cooperative projects, developing standards and procedures for data sharing, and standardizing geographic and tabular database design and development. These are regular meetings with a recurring purpose and focus which is more characteristic of Level 2 where the setting is moderately structured. In our judgment, these are not the moderately unstructured, *ad hoc* contacts described at Level 3. *Ad hoc* contacts are not established on a routine basis, the purpose and extent of each contact is different, and the role and authority of each party is identified and developed during the course of the contact. Factor 6 is evaluated at Level 2.

Purpose of contacts

The purpose of personal contacts ranges from factual exchanges of information to situations involving significant or controversial issues and differing viewpoints, goals, or objectives. The personal contacts that serve as the basis for the level selected for this factor must be the same as the contacts that are the basis for the level selected for Factor 6. The Bureau evaluated this factor at Level b and the appellants do not disagree. Comparable to Level b on page 24 of the Guide, the appellants' PD reflects that the purpose of the appellants' contacts is to coordinate and plan GIS programs and projects. Level c, where the purpose is to influence managers or officials to accept and implement findings and recommendations on organizational improvement or program effectiveness, is not met. This factor is evaluated at Level b.

A combination of Level 2 and Level b converts to 75 points according to the conversion chart on page 24 of the Guide.

Factor 8, Physical demands -- Level 8-1 -- 5 points

This factor covers the requirements and physical demands placed on the employee by the work assignment. Like Level 8-1 in the Guide, the appellants' work is mostly sedentary. Occasionally they lift and move computer equipment and supplies when installing, repairing, or transferring the equipment. Their assignments do not involve long periods of standing, bending, and stooping in industrial areas as described at Level 8-2. This factor is evaluated at Level 8-1 and 5 points are credited.

Factor 9, Work environment -- Level 9-1 -- 5 points

This factor considers the risks and discomforts in the employee's physical surroundings, or the nature of the work assigned and the safety regulations required. Like Level 9-1 in the Guide, the appellants' work is performed in a typical office environment and occasionally they are required to travel. The record does not reflect that their work environment is comparable to Level 9-2 where assignments regularly require visits to industrial areas involving moderate risks or discomforts. This factor is evaluated at Level 9-1 and 5 points are credited.

Summary

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

Factor	Level	Points
1. Knowledge required by the position	1-6	950
2. Supervisory controls	2-3	275
3. Guidelines	3-3	275
4. Complexity	4-3	150
5. Scope and effect	5-3	150
6. Personal contacts	6-2	
7. Purpose of contacts	7-b	75
8. Physical demands	8-1	5
9. Work environment	9-1	<u>5</u>
Total points:		1885

The appellants' positions warrants 1885 total points. Therefore, in accordance with the grade conversion table on page 3 of the Guide, their positions are properly graded at GS-9.

Decision

The appellants' positions are properly classified to the Miscellaneous Administration and Program Series GS-301, graded at GS-9, and titled at the agency's discretion.