

U.S. Office of Personnel Management
Division for Human Capital Leadership & Merit Systems Accountability
Classification Appeals Program

Chicago Field Services Group
230 South Dearborn Street, Room 3060
Chicago, IL 60604

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

Appellants: [appellant]

Agency classification: Security Officer
GS-080-12

Organization: [location]
[location]
[location]
[location]
U.S. Army Reserve Command
Department of the Army
[city and state]

OPM decision: Security Officer
GS-080-12

OPM decision number: C-0080-12-01

Ricardo Sims for

William B. Middendorf, Jr.
Classification Appeals Officer

December 29, 2003

Date

As provided in section 511.612 of title 5, Code of Federal Regulations (CFR), 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* (PCS's), appendix 4, section G (address provided in appendix 4, section H).

Decision sent to:

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Introduction

On April 10, 2003, the Chicago Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant]. The appellant's position is currently classified as a Security Officer, GS-080-12. The appellant requests that his position be reclassified to GS-301-13. We received the agency's administrative report concerning the appeal on May 5, 2003. The position is located in the [region, location], [location], U.S. Army Reserve Command (USARC), Department of the Army, in [city and state]. We have accepted and decided the appeal under section 5112 of title 5, United States Code (U.S.C.).

Background Information

The appellant's previous position, classified as Supervisory Security Specialist, GS-0080-12, was responsible for supervising the physical security and police programs at [city and state] and for an off-post customer base. In a reorganization effective on July 1, 2002, a new position was written combining those responsibilities with supervisory responsibilities for the fire program at [army base]. The appellant and his supervisor submitted a series of three revised draft position descriptions (PD) reflecting the additional responsibilities to the Human Resources Office in late 2002 and early 2003 for a classification advisory. The North Central Civilian Personnel Operations Center issued advisories on the classification of each of these PD's at the GS-12 level with the last one dated January 3, 2003. That advisory opinion recommended the classification of the position as Security Officer, GS-080-12. The advisory opinion was accepted by the classifying official and the position was so classified on February 4, 2003. The appellant was formally reassigned to his current official PD, Number [#####], on February 9, 2003.

Both the appellant and his supervisor agree that the PD of record is accurate and complete with respect to the duties and responsibilities of the position, but the appellant believes his work warrants higher credit based upon the knowledge required by his position, the supervisory controls in effect over his position, and the position's complexity (Factors 1, 2 and 4 in the Security Administration Series, GS-080, position classification standard (PCS)), as well as program scope and effect of his position (Factor 1 in the General Schedule Supervisory Guide (GSSG)).

General Issues

The appellant makes various statements about his agency's review and evaluation of his position. In adjudicating this appeal, our only concern is to make our own independent decision on the proper classification of his position. By law, we must make that decision solely by comparing his current duties and responsibilities to OPM 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 that comparison.

The appellant also questions how his position could remain at the GS-12 grade level when he has assumed significant additional duties and responsibilities. However, volume of work cannot be considered in determining the grade of a position (chapter 5 of *The Classifier's Handbook*).

Position information

The appellant is the Chief, Protective Services Division. He directs a protective services program consisting of law enforcement, physical security, fire prevention and protection functions, and emergency medical services for USARC at [city and state]. He also advises on these activities for two of [army base] sub-installations, [army installation], [army] Reserve Forces Training Area, [state]. Employment at [location] includes 1,620 civilians; 398 military; and 242 contract employees; [installation] has 179 civilians, 147 military personnel, and 16 contract employees; and Parks Reserve Forces Training Area has 475 civilians, 151 military and 115 contract employees. He manages the Intrusion Detection System (IDS) Program and associated monitoring station for eight USARC Regional Readiness Commands (RRCs) that are monitored remotely from [army base] by his staff. For six RRCs, he plans, directs, and provides technical guidance necessary for the USAR physical security and fire inspection programs and coordinates the development and maintenance of the USARC Physical Security Database and the USARC Fire Inspection Database.

His authorized staff of 134 employees includes ten supervisors ranging in grade from GS-8 through GS-12. The appellant supervises the fire and emergency services branch through the Fire Chief, GS-081-12, who has technical responsibilities for those programs. The staff of 43 includes 17 Firefighter (EMT), GS-081-7 and three supervisors. He has full supervisory responsibilities for the law enforcement branch which includes a staff of 70 headed by a Supervisory Police Officer GS-083-11 with five subordinate supervisors and 32 Police Officers, GS-083-06. He also has full supervisory responsibilities for the Physical Security Branch whose 21 employees includes two Supervisory Physical Security Specialists, GS-080-11, one of which heads the branch. That branch also includes a staff of 16 Physical Security Specialists, GS-080-9, 11 of which are remotely located physical security inspectors who are supervised by the other GS-11.

We conducted a telephone audit with the appellant on August 22, 2003, and a telephone interview with his supervisor, Mr. Tony Stapleton, on September 19, 2003. The PD of record contains the major duties and responsibilities assigned by management and performed by the appellant. In deciding this appeal, we fully considered the audit and interview findings and all information of record furnished by the appellant and his agency, including his official PD which we incorporate by reference into this decision.

Series, title, and standard determination

The agency has classified the position in the Security Administration Series, GS-080, and titled it Security Officer. The appellant has asked that the position's series be changed to GS-301 because he is supervising work in several different classification series.

The Miscellaneous Administration and Program Series, GS-301, includes positions that perform or supervise administrative two-grade interval work properly classified in more than one series for which no other series is appropriate. The essential criterion for classifying positions in this series is that the primary work of the position is not classifiable in any other series.

Positions frequently involve mixtures of work classifiable in more than one occupational series. However, as discussed in *The Introduction to the PCS's (Introduction)*, many mixed positions

should be classified in the series covered by the grade controlling duties of the position. At other times, the series can be determined only after considering the paramount qualifications required, sources of recruitment and line of progression, the reason for establishing the position, and the background knowledge required. Only in those relatively rare cases where none of the qualification standards for the series involved would provide an adequate avenue of recruitment should classification in the Miscellaneous Administration and Program Series, GS-301, be considered.

We find that the appellant's position is covered by the GS-080 series. While the position has supervisory responsibilities over fire and police positions, the appellant's primary and paramount duties fall within the type of work covered by the position classification standard (PCS) for the Security Administration Series, GS-080. This includes positions in which the primary duties are analytical, planning, advisory, operational, or evaluative work that has as its principal purpose the development and implementation of policies, procedures, standards, training, and methods for identifying and protecting information, personnel, property, facilities, operations, or material from unauthorized disclosure, misuse, theft, assault, vandalism, espionage, sabotage, or loss. This accurately describes the primary work of this position.

Security Officer is the authorized title for positions in organizational units responsible for the development, installation, and management of a security program for a governmental organization, organizational segment, installation, or other unit, which is subject at the local level only to administrative supervision and control. This description compares favorably with the position in question. Therefore, this position is properly titled Security Officer.

The *Introduction* states that for positions covered by standards which measure program management authorities, the grade level is typically governed by program management duties and responsibilities. For positions which are primarily supervisory, the grade level will usually be determined by the GSSG. The overall grade of the position should reflect the highest level of program management or supervisory work performed.

As stated in the GS-080 PCS, grade levels of Security Officer positions can be established using the criteria in the GS-080 PCS, the GSSG, or through cross-series comparison to standards for other series which cover program management functions. However, since the management and supervision of security programs has been determined to be paramount, the position will be evaluated using the GS-080 PCS and the GSSG.

Evaluation using the GS-080 PCS

The GS-080 PCS is in the Factor Evaluation System (FES) format. This system requires that credit levels assigned under each factor relate to only one set of duties and responsibilities. Under FES, work must be fully equivalent to the factor-level described in the PCS to warrant credit at that level. If work is not fully equivalent to the overall intent of a particular level described in the standard, a lower level and point value must be assigned, unless the deficiency is balanced by an equally important aspect of the work that meets a higher level. The appellant disagrees with the agency evaluation of Factors 1, 2 and 4. He does not contest the agency evaluation of Factors 3, 5, 6, 7, 8, and 9. Based on our review of the record and of these factors,

we agree with the agency determination for these factors. Accordingly, we will limit our discussion to Factors 1, 2, and 4.

Factor 1: Knowledge Required by the Position

This factor assesses the nature and extent of information or facts that employees 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.

Comparable to Level 1-7, the appellant uses knowledge of a wide range of security concepts, principles, and practices to analyze, and resolve difficult and complex security problems. However, his security inspection and data collection and display responsibilities extend to a geographic region covering six of the 14 Regional Readiness Commands (RRCs) dispersed across 20 states. This exceeds Level 1-7, where work typically involves overlapping and conflicting requirements, but is limited to a single facility or for a geographic region. However, consistent with Level 1-7, the appellant's knowledge is used in responding to problems or questions involving implementation of security guidelines at lower levels and in inspecting operating security programs for adequacy, efficiency, and need for improvement. The appellant directs, plans and recommends the installation of comprehensive security systems involving personnel access controls, physical protection devices, monitoring equipment, security forces, remote alarm equipment, and other measures at [city and state] He directs subordinate staffs of security and fire specialists in the inspection of these systems. On construction projects such as improvements to front gate security at [army base], he must consider and apply several alternatives according to the security requirements, availability of materials, relationships with other protective programs, cost/benefit considerations, and the status of funds as would be the case at Level 1-7. Consistent with Level 1-7, he advises the installation commander and staff and interprets new policy issuances for application in a variety of environments and locations. As would be typical of Level 1-7, his security inspection and IDS program responsibilities require that he use a knowledge of a great variety of state-of-the-art security equipment and devices in planning and implementing protective methods and security procedures including locking devices for doors, vaults, and gates; fencing; a variety of alarm and detection devices; closed circuit television systems; and other approaches designed for protecting personnel, equipment, and facilities. The knowledge required by the applicant's position fully meets Level 1-7.

Level 1-8 is not met. The appellant's responsibilities require him to possess a full command of the physical security inspection program, the USARC Physical Security Compliance Inspection Database Program, and the USARC Intrusion Detection System Program. These duties extend to approximately 60 percent to 75 percent of the USARC locations and/or personnel. However, these duties do not involve full operation of security programs at these locations but are limited to review and oversight to check for compliance with well established standards and relaying and recording of alarms. Through his supervision of the Fire Chief for whom he sets goals and evaluates their accomplishment, he is responsible for fire and emergency services programs at [army base] as well as the USARC fire inspection and associated data collection and display programs. The appellant is not required to use this knowledge to resolve major conflicts in policy and program objectives since policy responsibilities are retained by USARC headquarters. Similarly, while he is called upon to participate as a subject matter expert, his duties do not

require him to regularly function as a technical authority in assignments requiring the application of new theories and developments to security problems not susceptible to treatment by accepted security methods, technology, or procedures. Neither is he using his knowledge to resolve major conflicts in policy and program objectives, nor in key decision-making and policy-developing responsibilities in very difficult assignments that are typical of Level 1-8. In sum, though he has involvement at the USARC level, his position is neither involved in recommending methods for enhancing efficiency of security systems through modifications and applications of evolving technology for major Army and interagency security projects nor in evaluating and making recommendations concerning overall plans and proposals for major Army and interagency security projects as identified at Level 1-8.

Level 1-7 is credited for 1250 points.

Factor 2: Supervisory Controls

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work.

Comparable to Level 2-4, the appellant's supervisor sets the overall objectives and decides when available resources may be used. The employee consults with his supervisor in determining which new projects to initiate. The appellant plans the work, develops deadlines, identifies needed resources, ensures work is carried out, resolves conflicts, and interprets policy. He integrates and coordinates work accomplishment and ensures work is completed. The appellant is expected to keep his supervisor informed of progress, potentially controversial matters, or situations with far-reaching implications. His effectiveness in meeting objectives and achieving expected results is based on his supervisor's review of his finished work. All of these supervisory controls are consistent with Level 2-4.

Level 2-5 is not met. While the level of independence from supervisory control exhibited by the appellant for such things as making extensive technical judgments and planning and carrying out the security program exceeds that described at Level 2-4, the record shows he does not have the full authority required at that level. That ultimate authority resides with his supervisor. His supervisor retains responsibility for overall management of a comprehensive protective services program for the installation and the off-post customer base including management of the IDS, physical security and fire safety inspection programs. The appellant's supervisor also establishes priorities and requirements, reviews the appellant's work for compliance with those priorities and requirements, and approves the work accomplished. His supervisor is responsible ultimately for the developing, executing, and monitoring directorate policies, its budget, and long-range operating program goals and objectives. The supervisor retains responsibility for the approval of the expenditure of allocated funds, and exercises the final authority for the full range of administrative, personnel, and management actions and decisions made. For example, while the appellant recommended a specific gate design and guard shelter configuration and recommended hiring fire inspectors as permanent employees, the appellant's supervisor made the decisions on those issues. Since the broad delegated authority for independently planning, carrying out, and monitoring the effectiveness of the operation of the security program found at Level 2-5 are exercised and controlled at echelons above the appellant, his position does not meet the threshold for crediting Level 2-5.

Level 2-4 is credited for 450 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.

Comparable to Level 4-4, the appellant directs law enforcement, physical security, and fire and emergency programs duties involving many different and unrelated processes, methods, and requirements relating to well-established areas of security planning and administration for serviced organizations at [location] including such organizations as the [location] Airport (a joint-use, military/civilian facility, the Army Reserve Readiness Training Center, the Regional Training Site - Medical, the Regional Training Site - Maintenance, the U.S. Army Noncommissioned Officer Academy and the [state] National Guard Military Academy. Programs and projects are funded by different organizations with differing security or protective requirements and ability to fund implementation. As with Level 4-4, the appellant's security and fire inspection and IDS program responsibilities require established security policies, practices, procedures, and techniques to be varied for a physical security inspection operation which cover 20 states and for 800 Intrusion Detection System accounts in 35 states. These systems differ in the kind and level of security, complexity, and local circumstances requiring adjustment or modification in established approaches. These responsibilities require the incumbent to plan, develop recommendations, and apply and refine established security methods, techniques, equipment, techniques, and objectives to a variety of situations with variations in the level of security required. The complexity of the appellant's position fully meets Level 4-4.

Level 4-5 is not met. At this level, work directed involves originating new security techniques, establishing criteria, or developing new information and approaches to problem solutions. This is not descriptive of the duties he performs on a regular and recurring basis. His responsibilities do not include developing broad security policies and regulations which require consideration of the total range of existing policies, procedures, laws, and regulations and the program goals and objectives which are to be fulfilled as would be the case at Level 4-5. Writing security policies and regulations is a responsibility retained by the headquarters office. The incumbent's work is not typified by regular requirements as found at Level 4-5 to make significant departures from established practices, or to develop and implement new methods and techniques that satisfy policy and operational requirements, but rather to make decisions concerning established areas of security methods and techniques.

Level 4-4 is credited for 450 points.

Summary

In sum, the appellant's position is assigned the following factor levels:

| <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 | 3-4 | 450 |
| 4. Complexity | 4-4 | 225 |
| 5. Scope and effect | 5-4 | 225 |
| 6. Personal contacts | 6-3 | 60 |
| 7. Purpose of contacts | 7-3 | 120 |
| 8. Physical demands | 8-1 | 5 |
| 9. Work environment | 9-1 | 5 |
| <i>Total</i> | | 2,790 |

Using the Grade Conversion Table in the PCS, a total of 2,790 points falls within the GS-12 range (2,755-3,150 points).

Evaluation using the GSSG

The GSSG uses a point-factor approach with six evaluation factors designed specifically for supervisory positions. Each factor level in the 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 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. The position must fully meet the intent of a factor level to be credited at that level. Each factor level has a corresponding point value. The total points are converted to a grade by use of the grade conversion chart in the standard. Under each factor there are several factor level definitions which are assigned specific point values. The appellant disagrees with the agency evaluation of Factor 1. He does not contest the agency evaluation of Factors 2, 3, 4, 5, and 6. Based on our review of the record, we agree with the agency determination for Factors 2 and 3 but not Factors 4, 5, and 6. Accordingly, we will limit our discussion to Factor 1, 4, 5, and 6.

Factor 1, Program Scope and Effect:

This factor assesses the general complexity, breadth, and impact of the program areas and work directed, including the organizational and geographical coverage. It also assesses the impact of the work both within and outside the immediate organization. To credit a particular factor level, the criteria for both scope and effect must be met. The agency credited Level 1-2. The appellant says that Level 1-4 should be credited because he is responsible for directing the Intrusion Detection System (IDS) Program and its associated monitoring station for eight USARC Regional Readiness Commands (RRCs). He also plans, directs, coordinates, budgets, and gives technical guidance as necessary for the USAR physical security and fire inspection programs and

coordinates the development and maintenance of the USARC Physical Security Database and the USARC Fire Inspection Database for six RRCs.

The levels of this factor describe two situations: agency line programs, e.g., providing services to the public; and support programs, e.g., providing administrative or other services within an agency. The appellant's work falls under the second situation.

a. Scope

This element addresses the general complexity and breadth of: (1) the program (or program segment) directed; and (2) the work directed, the products produced, or the services delivered. The geographical and organizational coverage of the program (or program segment) within the agency structure is addressed under this element.

At Level 1-2, the program segment or work directed is administrative, technical, complex clerical, or comparable in nature, has limited geographical coverage, and supports most of the activities comprising a typical agency field office, an area office, a small to medium military installation, or comparable activities within agency program segments.

Level 1-2 is met. The appellant's work is protective and is carried out through a combination of line and staff functions. He directs a comprehensive protective services program at Fort McCoy, Wisconsin. Off post, he manages the Intrusion Detection System (IDS) Program and associated monitoring station for eight USARC Regional Readiness Commands (RRCs). For six RRC's, he plans, directs, coordinates, budgets, and technical guidance necessary for the USAR physical security and fire inspection programs and coordinates the development and maintenance of the USARC Physical Security Database and the USARC Fire Inspection Database. The geographically dispersed nature of inspections and alarm systems program segments exceeds that aspect of the work described at Level 1-2 where services are provided to activities comprising a small to medium military installation or an area office.

At Level 1-3, the position directs a program segment that performs technical, administrative, protective, investigative, or professional work covering a major metropolitan area, a state, or a small region of several states; or, when most of an area's taxpayers or businesses are covered, comparable to a small city. Providing complex administrative or technical or professional services directly affecting a large, or complex, multi-mission military installation also falls at this level. Illustrative of work at this level is directing **all** personnel, budget or similar services for a bureau or major military command headquarters, a large or complex multi-mission military installation, an organization of similar magnitude, or a group of organizations which, as a whole, are comparable.

The appellant's position does not fully meet the criteria at Level 1-3. The work supervised primarily impacts [location] and limited portions of program segments concerned with inspections and alarm systems over a portion of the nation. The position does not fully meet the complexity and breadth typical of Level 1-3 programs or services since the level of work directed, as credited in Factor 5 (GS-7 or GS-8) falls below GS-9 which is the first full performance level of administrative, professional, or equivalent work involved in providing

complex administrative, technical or administrative services. Because the position fails to fully meet all aspects of Level 1-3, Level 1-2 must be credited for Scope.

b. Effect

This element addresses the impact of the work, the products, and/or the programs described under "Scope" on the mission and programs of the customer(s), the activity, other activities in or outside of the Federal Government, the agency, other agencies, the general public, or other entities.

At 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 county.

Level 1-2 is met. The appellant's work significantly effects Fort McCoy programs and objectives and significantly impacts other functions and activities throughout the installation and other organizations serviced.

At Level 1-3, the activities, functions, or services accomplished directly and significantly impact a wide range of agency activities, the work of other agencies, the operations of outside interests, i.e., a segment of a regulated industry, or the general public. At the field activity level, i.e., large, complex multi-mission organizations or very large serviced populations, the work directly involves or substantially impacts the provision of essential support services to numerous, varied, and complex technical, professional, or administrative functions.

Level 1-3 is not met. The appellant's work directly impacts [location]. While the IDS and inspection work directed off post by the appellant does support a group of organizations, the activities, functions, and services accomplished do not directly and significantly impact a wide range of Army activities as required at Level 1-3 since they are not complex services as discussed previously. Given the nature of USARC field operations supported, the work does not directly involve or substantially impact the provision of essential support operations to numerous, varied, and complex technical, professional, and administrative functions as required at Level 1-3.

Level 1-2 is credited for Effect.

Both Scope and Effect equate to Level 1-2. Therefore, Factor 1 is credited with Level 1-2, for 350 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 same contacts that serve as the basis for the level credited under Subfactor 4A must be used to determine the correct level under Subfactor 4B.

Subfactor 4A, Nature of Contacts

At Level 4A-2, frequent contacts are with members of the business community or the general public; higher-ranking managers, supervisors, and staff of other units throughout the activity or at levels below bureau or major military command level; representatives of local public interest groups, case workers in Congressional district offices; technical or operating personnel in State and local governments; reporters for local or other limited media outlets; or comparable contacts. These contacts may be informal, occur in conferences and meetings, or take place through telephone, televised, radio, or similar contact, and sometimes require nonroutine or special preparation.

The appellant's contacts meet Level 4A-2. The appellant regularly and routinely meets officials at the installation level and below, with officials at USARC which is not a major command (USARC is a subordinate command of the U.S. Army Forces Command), contractors, and state and local police officials, vendors, and contractors. These contacts occur in person, conferences and meetings, or take place through telephone contact, and can sometimes require special preparation.

At Level 4A-3, recurring contacts are with high-ranking military or civilian managers at bureau and major organizational levels within the agency, with agency administrative personnel, or with comparable personnel in other agencies; key staff of public interest groups with significant political influence or media coverage; journalists representing influential city or county news media; Congressional committee and subcommittee staff assistants; contracting officials and high-level technical staff of large industrial firms; or local officers of regional or national trade associations, public action groups or professional organizations; or with State and local government managers. These contacts take place in meetings and conferences and often require extensive preparation.

Level 4 A-3 is not met. The agency credited the position at Level 4A-3 and with contacts with high-ranking managers and technical staff at the bureau and major organization levels of the command. The appellant does not routinely meet with higher-ranking military or civilian managers at Army or major command levels or with Army administrative personnel, or with comparable personnel in other agencies. In addition, the appellant's contacts do not normally require extensive preparation as described at Level 4A-3.

Level 4A-2 is credited for 50 points.

Subfactor 4B, Purpose of contacts

The purpose of contacts at Level 4B-2 is to provide accurate and consistent information to outside parties; to plan and coordinate the work directed with that of others outside the organization; or to resolve differences of opinion among managers, supervisors, employees, contractors or others.

The purpose of the appellant's contacts meets Level 4B-2. The appellant's contacts are primarily to exchange information, coordinate and plan program activities, advise and brief on security issues, and resolve problems.

Contacts at Level 4B-3 are to justify, defend, or negotiate in representing the program segment or organizational unit directed in obtaining or committing resources and in gaining compliance with established policies, regulations, or contracts. Contacts at this level usually involve active participation in conferences, meetings, hearings, or presentations involving problems or issues of considerable importance to the program segment managed.

Level 4B-3 is not met. Though the agency, when it credited Level 4B-3, based on the purpose of the appellant's contacts as representing the organization supervised; to gain compliance management requirements; and to advise higher-ranking officials on program issues the record does not show that these types of contacts are regular and recurring. The appellant's regular and recurring contacts do not involve justifying, defending, or negotiating in obtaining or committing resources. The significant decisions related to what resources will be committed are made at levels above the appellant.

Level 4B-2 is assigned for 75 points.

Factor 5, Difficulty of Typical Work Directed:

This factor measures the difficulty and complexity of the basic work most typical of the organization(s) directed, as well as other line, staff, or contracted work for which the supervisor has technical or oversight responsibility, either directly or through subordinate supervisors, team leaders, or others. It requires determining the highest grade which best characterizes the nature of the basic (mission oriented) nonsupervisory work performed by the organization directed; and constitutes 25 percent or more of the workload (not positions or employees) of the organization. Excluded from consideration are the work of lower level positions that primarily support or facilitate the basic work of the unit and supervisory or lead work. In some cases, however, a heavy supervisory or managerial workload related to work above that base level may be present. For these positions, the level of work credited is the highest grade of nonsupervisory work directed which requires at least 50 percent of the duty time of the supervisory position under evaluation. The resulting grade may be used as the base level for second (and higher) level supervisors over large workloads if sound alignment with other supervisory positions in the organization and agency results.

Level 5-4 is met. The approved organizational structure consists of approximately 134 staff years of civilian employee work. The nonclerical, nonsupervisory workload is approximately 113 staff years. Assuming each subordinate nonsupervisory, nonlead position performed grade controlling work 100 percent of the time (and the nonsupervisory work performed by supervisors at the level of nonsupervisory work directed based on the position descriptions of record), the subordinate workload consisted of 34 staff years of GS-7 or above grade level work. The highest grade, then, which best characterizes the basic nonsupervisory work of the organization, and which constitutes 25 percent or more of the workload of the organization is at the GS-7 level.

Level 5-5 is not met. The agency using the alternative base level methodology credits the position with a heavy managerial workload related to the work at the GS-9 level that requires at least 50 percent of the appellant's duty time. Based on the delegation of authority and freedom from supervision present in the GS-9 position descriptions of record (certified as current and

accurate) and the existence of subordinate supervisory positions over the GS-9 work, the record and interviews do not support the conclusion that the appellant devotes 50 percent or more of his work time overseeing the GS-9 grade level work. Because the alternative base level methodology is not applicable to the position, Level 5-5 may not be credited.

Level 5-4 is assigned for 505 points.

Factor 6 - Other Conditions

This factor measures the extent to which various conditions contribute to the difficulty/complexity of carrying out supervisory duties, authorities, and responsibilities. Conditions affecting work for which the supervisor is responsible (whether performed by Federal employees, assigned military, contractors, volunteers, or others) may be considered if they increase the difficulty of carrying out assigned supervisory or managerial duties and authorities.

To evaluate Factor 6, two steps are used. First, the highest level that a position meets fully is initially credited. Then, if the level selected is Level 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 additional level is added to the level selected in the first step. If the level selected in the first step is Level 6-4, 6-5, or 6-6, the Special Situations may not be considered in determining whether a higher factor level is creditable.

Supervision and oversight at Level 6-3a requires coordination, integration, or consolidation of administrative, technical, or complex technician or other support work comparable to GS-9 or 10, or work at the GS-7 or 8 level where the supervisor has full and final technical authority over the work. Directing the work at this level (cases, reports, studies, regulations, advice to clients, etc.) requires consolidation or coordination similar to that described at Level 6-2a, but over a higher level of work. At Level 6-3b, the position directs subordinate supervisors over positions in grades GS-7 or 8 or the equivalent which requires consolidation or coordination similar to that described at Level 6-2a within or among subordinate units or with outside units.

Supervision at Level 6-4a requires substantial coordination and integration of a number of major work assignments, projects, or program segments of professional, scientific, technical, or administrative work comparable in difficulty to the GS-11 level. At Level 6-4b, the position directs subordinate supervisors who each direct substantial workloads comparable to the GS-9 or 10 level. Such base work requires coordination similar to that described at Factor Level 6-3a, above, for first line supervisors.

Factor 6 is linked directly to the previous factors. The difficulty of work is measured primarily by the base level determined in Factor 5. Complexity is measured by the degree of coordination required, and increases as the base level increases. The agency credited the position with level 6-3a based on the position requiring integration of administrative work at the GS-9 level. As discussed previously, we find that this position functions as a second-level supervisor over a GS-7 base level of work and does not require coordination, integration, or consolidation of administrative, technical, or complex technician or other support work comparable to GS-9 or above. Thus, the position may not be credited at Level 6-3a or at Level 6-4a because the appellant does not directly supervise nonsupervisory work that supported a GS-9 or higher base

level. Rather, the appellant supervised GS-9 grade level work indirectly as a second-level supervisor. Level 6-4b also was not applicable to the position since there was not sufficient work at or above the GS-9 grade level in the Division to permit the crediting of *each* subordinate supervisory position with supervising substantial workloads with a GS-9 base level. The position meets Level 6-3b because, based on the amount of GS-7 grade level and higher level work in the Division, the position entails the direction of subordinate supervisors over positions in grades GS-7 or higher which required consolidation and coordination similar to Level 6-2a.

The position fully meets Level 6-3b since the appellant direct subordinate supervisors over positions in grade GS-7 through GS-9, and the work requires continuing effort to assure quality and service standards relating to timeliness, form, procedure, accuracy, and quantity.

Our analysis of Special Situations as they pertain to the position follows:

1. Variety of Work

This situation is credited when more than one kind of work, each kind representing a requirement for a distinctly different additional body of knowledge on the part of the supervisor, is present in the work of the unit. A "kind of work" usually will be the equivalent of a classification series. Each "kind of work" requires substantially full qualification in distinctly separate areas, or full knowledge and understanding of rules, regulations, procedures, and subject matter of a distinctly separate area of work. Additionally, to credit "Variety" (1) both technical and administrative responsibility must be exercised over the work, and (2) the grade level of the work cannot be more than one grade below the base level of work used in Factor 5.

The appellant supervises through subordinate supervisors work classified in three different classification series, GS-080, GS-081, and GS-083 for which the supervisors exercise both technical and administrative responsibility over the work. The grade level of the lowest work supervised, GS-6 for the GS-083 work and some of the 081 work, is no more than one grade below the base level of work used in Factor 5, GS-7. Therefore, this situation is credited.

2. Shift Operations

This situation is credited when the position supervises an operation carried out on at least two fully staffed shifts.

There are three tours for full-time permanent personnel operating 24 hours per day, seven days per week basis for the fire, police, and security alarm monitoring systems. Therefore, this situation is credited.

3. Fluctuating Work Force or Constantly Changing Deadlines

The GSSG provides for crediting Fluctuating Work Force when the work force supervised by the position has large fluctuations in size (e.g., when there are significant seasonal variations in staff) and these fluctuations impose on the supervisor a substantially greater responsibility for training, adjusting assignments, or maintaining a smooth flow of work while absorbing and releasing employees. Constantly Changing Deadlines may be credited when frequent, abrupt, and

unexpected changes in work assignments, goals, and deadlines require the supervisor constantly to adjust operations under the pressure of continuously changing and unpredictable conditions.

Fluctuations in work force size are not regular and recurring and have not imposed on the appellant a substantially greater responsibility for training, adjusting assignments, or maintaining a smooth flow of work while absorbing and releasing employees. Work assignments, goals, and deadline changes are not frequent and abrupt within the meaning of the GSSG. Therefore, this situation is not credited.

4. Physical Dispersion

The GSSG provides for crediting this situation when a substantial portion of the workload for which the supervisor is responsible is regularly carried out at one or more locations that are physically removed from the main unit (as in different buildings, or widely dispersed locations in a large warehouse or factory building), under conditions that make day-to-day supervision difficult to administer.

A substantial portion of the workload of the organization is regularly carried out at locations remote from the main unit. However, these employees are under the direct supervision of subordinate supervisors. This makes day-to-day supervision difficult to administer for those immediate supervisors but not for the appellant's position. Therefore, this situation is not credited.

5. Special Staffing Situations

The GSSG permits crediting this situation when: (1) a substantial portion of the work force is regularly involved in special employment programs; or in similar situations that require involvement with employee representatives to resolve difficult or complex human resources management issues and problems; (2) requirements for counseling and motivational activities are regular and recurring; and (3) job assignments, work tasks, working conditions, and/or training must be tailored to fit the special circumstances.

Any demands on this position are mitigated by the involvement of one or two layers of immediate supervisors. Therefore, this situation is not credited.

6. Impact of Specialized Programs

Credit this situation when supervisors are responsible for a significant technical or administrative workload in grades above the level of work credited in Factor 5, provided the grades of this work are not based upon independence of action, freedom from supervision, or personal impact on the job.

The appellant is responsible for a significant workload for 16 Physical Security Specialist positions above the GS-7 level of work credited in Factor 5. The grades of this work are not based upon independence of action, freedom from supervision, or personal impact on the job. Therefore, this situation is credited.

7. Changing Technology

The GSSG credits this situation when processes and procedures vary constantly because of the impact of changing technology, creating a requirement for extensive training and guidance of the subordinate staff.

Though technology of security systems is changing it does not require the extensive training and guidance of the subordinate staff because of constantly varying processes and procedures within the meaning of the GSSG. Therefore, this situation is not credited.

8. Special Hazard and Safety Conditions

The GSSG credits this situation when the supervisory position is regularly made more difficult by the need to make provision for significant unsafe or hazardous conditions occurring during performance of the work of the organization.

The appellant is responsible for significant fire fighting and law enforcement functions. His supervisory responsibilities are regularly made more difficult by the need to make provision for significant hazardous conditions occurring during performance of the work of the organization. Therefore, this situation is credited.

Since the position fully meets Level 6-3b and has four Special Situations credited, Level 6-4 is credited for 1120 Points.

The appellant's position is assigned the following factor levels:

| <i>Factor</i> | <i>Level</i> | <i>Points</i> |
|---------------------------------------------------|--------------|---------------|
| 1. Program Scope and Effect | 1-2 | 350 |
| 2. Organizational Setting | 2-1 | 100 |
| 3. Supervisory and Managerial Authority Exercised | 3-3b | 775 |
| 4. Personal Contacts | | |
| A. Nature of Contacts | 4A-3 | 50 |
| B. Purpose of Contacts | 4B-3 | 75 |
| 5. Difficulty of Typical Work Directed | 5-5 | 505 |
| 6. Other Conditions | 6-3a | 1120 |
| <i>Total</i> | | 2975 |

Using the point-to-grade conversion chart in the GSSG, a total of 2975 points falls within the GS-12 range (2,755-3,150 points).

Summary

Based the rules for mixed positions contained in the *Introduction*, the appellant's security program work and supervisory responsibilities occupy sufficient portion of the appellant's time

to control the classification of his position. Both these aspects of the appellant's work are properly classified at the GS-12 level. Therefore, the appellant's position is properly classified at the GS-12 level.

Decision

The appellant's position is properly classified as Security Officer, GS-080-12.