

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

Chicago Field Services Group
230 S. Dearborn Street, DPN-30-6
Chicago, IL 60604-1687

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

Appellant: [appellant]

Agency classification: Navigation Program Specialist
GS-1101-11

Organization: Operations Branch
Construction-Operations Division
[name] District
[name] Division
U.S. Army Corps of Engineers
Department of the Army
[location]

OPM decision: GS-1101-11
(Title at agency discretion)

OPM decision number: C-1101-11-04

/s/ Robert D. Hendler

Robert D. Hendler
Classification and Pay Claims
Program Manager

March 31, 2006

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, payrolls, 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).

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Introduction

On April 4, 2005, the Chicago Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant] who occupies the position of Navigation Program Specialist, GS-1101-11, with the Operations and Emergency Management (Operations) Branch, Construction-Operations Division (CO Division), [name] District (District), [name] Division ([installation]), United States Army Corps of Engineers (USACE)(COE), Department of the Army, [location]. The appellant believes his position should be reclassified as Navigation Program Specialist, GS-1101-12. We received the complete agency administrative report on April 22, 2005. We accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

To help decide the appeal, we conducted a telephone audit with the appellant on September 29, 2005, and a telephone interview with his immediate supervisor on September 29, 2005. We also interviewed the Navigation and Dredging Program Manager ([installation] Program Manager) at the [installation] by telephone on March 30, 2006. In reaching our decision, we carefully considered the audit and interview findings and all information of record furnished by the appellant and the agency.

General issues

The appellant occupies position description (PD) # [#####] which was revised on June 2, 2004, as a result of an appeal decision by the Classification Appeals Adjudication Section, Civilian Personnel Management Service (CPMS), Department of Defense. The CPMS decision changed the occupational series code (from GS-343 to 1101) and title (from Management and Program Analyst to Navigation Specialist). Both the appellant and his supervisor have certified to the PD's accuracy, but the appellant disagrees with the grade level determination.

A PD is the official record of the major duties and responsibilities assigned to a position by a responsible agency official; i.e., a person with authority to assign work to a position. A position is the duties and responsibilities that make up the work performed by an employee. Classification appeal regulations permit OPM to investigate or audit a position and decide an appeal based on the duties assigned by management and performed by the employee. We classify a real operating position, and not simply the PD. Therefore, this decision is based on the actual work assigned to and performed by the appellant.

Implicit in the appellant's rationale is a concern that his position is classified inconsistently with other COE positions that perform similar work. By law, we must classify positions solely by comparing current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since the comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's position to others, which may or may not be classified correctly, as a basis for deciding the appeal.

Like OPM, the appellant's 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 appellant considers his

position so similar to others that they all warrant the same classification, he may pursue the matter by writing to his human resources office. In doing so, he 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 his, the agency must correct their classification to be consistent with this appeal decision. Otherwise, the agency should explain to him the differences between his position and the others.

The appellant also provides a technical rationale to his appeal in disagreeing with the final decision issued by CPMS concerning their reference to a statement from the position classification standard (PCS) which they used to evaluate the position, the Administrative Analysis Grade Evaluation Guide (the Guide), specifically from Factor 3, Guidelines. In its decision, CPMS indicates that “there is no supporting evidence that he develops methodology for measurement and improvement of effectiveness and productivity in administering operating programs.” The appellant’s rationale is based on evidence he thinks shows he has such expertise, and further notes that he has been frequently assigned duties meeting the intent of the statement. He considers these assignments to have been made based on his successful work record. The appellant makes various other statements about the agency and its evaluation of his position. However, because our decision sets aside all previous agency decisions, the appellant’s concerns regarding his agency’s classification review process are not germane to this decision. In adjudicating this appeal, our only concern is to make our own independent decision based on the proper classification of the position, and we will consider the evidence provided by the appellant in our analysis.

He also expresses concern that classification of his position in the GS-1101 series hinders his ability to qualify for other positions within COE that require cross-series experience in biological sciences, engineering, and program analysis. He says that since he was assigned to the new PD in 2004, he has not made the best-qualified list for several vacancies for which he has applied. Again, the appellant’s concerns, in this case regarding his agency’s qualification review process, are not germane to this decision.

Position information

The appellant reports directly to the Operations Branch Chief, who occupies a Supervisory Civil Engineer, GS-810-13, position. The supervisor assigns work in broad terms of mission requirements and program objectives, including assignments from the District Resource Management (RM) Office, the captains of dredges, and from the Channels and Harbors and Locks and Dams Project Offices. The appellant provides support to the Physical Support Branch to develop plans and specifications for dredging contracts, and to write safety, spill response, and accident prevention plans. He also develops force configuration data for District organizations as assigned. The appellant keeps his supervisor apprised of progress in his project areas and other work assignments.

From the [installation] level, the Program Manager notes that unlike the engineering and planning functions which are highly regulated and require standard practices and procedures throughout COE, there is considerable latitude at the District level concerning navigation and dredging operations, especially the operations of locks and dams. Annually a large appropriation

is approved for [location] operations, and [installation] has limited oversight. District operations are decentralized with only some procedures, such as barge removal, being dictated from the Division. While there has been a recent attempt to standardize, the procedures for District operations remain substantially free from higher level direct control. He described his management of District operations more as providing advice by generally citing practices in other districts rather than direct supervision.

The appellant spends approximately 35 percent of his time providing project and program management assistance to the CO Division managers by coordinating technical reviews, assuring completion of contract documents, and researching and ordering supplies, materials, and equipment for projects to be completed by the Physical Support Branch. He is required to help define and integrate customer requirements into a comprehensive Project Management Plan (PMP), and leads or participates on Project Delivery Teams. While serving as a project manager, he must ensure adherence to the agency's PM Business Process, fully coordinating the PMP with various functional elements within the District and any contributing organizations, including establishing responsibilities and setting expectations.

The appellant spends about 35 percent of his time serving as the Navigation Business Manager. The appellant serves as the technical expert for District dredging, and manages the CO Division's plant replacement and equipment management programs. He gathers information, identifies and analyzes issues, and develops recommendations to resolve substantive problems that relate to dredging operations affecting a wide range of District field components. He conducts economic analyses to meet mission requirements such as determining whether to replace or buy new dredging equipment, to build a floating hotel or lodge dredge crews on shore, and whether to repair or replace bulldozers, cranes, barges, and other equipment. Under the agency's current business management approach to operations, he reviews all navigation operations to identify areas where efficiency and productivity improvements of dredging operations are possible, and makes recommendations to managers. He provides guidance and interpretation of current, revised, or new policies and regulations to the CO Division Chief and managers. He serves as a technical expert and provides liaison for District dredging and Physical Support Branch program areas, maintaining complete and updated records, including related regulations, policy statements, and accepted procedures.

The Operations and Maintenance Business Information Link (OMBIL) is the primary database for dredging analysis. Using OMBIL data, the appellant tracks trends and statistics in dredging and compares the District's numbers with other [installation] and COE districts, other government agencies, and private industry. After analyzing the OMBIL data, he confers with the CO Division managers, and makes recommendations for improving Division operations. He conducts outreach with COE partners, stakeholders, and customers, informing them of COE programs and services. The appellant reviews Operations Branch budget proposals, and project rankings to verify that customer needs are being met. He recommends, through the Operations Branch Chief, any changes to the proposed project rankings to the District Operations Maintenance Management Team. He also consolidates information from the field for various data calls from [installation] and HQ.

The appellant spends about 20 percent of his time monitoring District equipment usage. He is responsible for managing the CO Division's Plant Replacement and Improvement Program (PRIP) and equipment management programs. He coordinates revolving-fund matters, including PRIP requests and equipment management issues with CO Division managers and office chiefs, [installation], COE's Marine Design Center, and HQ program managers. He serves as equipment management liaison between District Support offices and field staff. Using Econopack software, he develops life-cycle cost analyses of equipment including cost benefit or economic evaluations of current and proposed equipment. He projects the amount of funding required for projects over a five-year time frame. He ensures that annual and five-year program acquisitions remain on schedule or are updated and are consistent with previously submitted requests. He also performs equipment evaluations to verify and maintain records of value of equipment.

He spends the balance of his time assisting with the District's environmental reviews. The appellant spends up to ten percent of his time providing support to the District's Coordinator for Environmental Review Guide for Operations (ERGO), serving as backup in his absence. He assists with external ERGO inspections of field sites and reporting requirements. The appellant refines existing work methods that relate to safety and equipment maintenance. For example, he has developed a number of local policies and plans relating to maintenance of heavy equipment, accident prevention, safety, and hazard analyses. He also assists with the review, editing, and updating of the various response and hazardous material management plans for field sites.

Based on our review, we find the official PD contains the major duties and responsibilities assigned to and performed by the appellant and we incorporate it by reference into our decision.

Title, series, and standard determination

As a result of the CPMS decision, the agency assigned the appellant's position to the Business and Industry Group, GS-1100, and classified it in the General Business and Industry Series, GS-1101. The appellant does not disagree. After careful of the record, we concur with the agency's determination because positions concerned with the direct management of an industrial production activity, including related staff and support activities, such as engineering, quality control, transportation, and supply functions with responsibility for determining requirements for facilities, funds, and manpower are classifiable to the General Business and Industry Series, GS-1101. Similar to positions in the GS-1100 Group, the primary work performed by the appellant (and according to his supervisor, the reason for establishing the position) includes advising on and administering programs that require a paramount knowledge of business practices, and the characteristics and use of property, the conduct of related investigations and studies, the collection, analysis, and dissemination of information, and the provision of advisory services, including organizational and manpower determinations. Therefore, this position belongs in the GS-1101 series because it covers other work properly classified in the GS-1100 Group for which no other series has been provided.

We considered placing the position in the Industrial Specialist Series, GS-1150, which includes positions that require primarily a practical knowledge of the nature and operations of an industry or industries, and the materials, facilities, and methods employed by the industry or industries in producing commodities. However, Exclusion 5 applies to the appellant's position since it

excludes positions concerned with the direct management of an industrial production activity, including related and support activities, such as engineering, quality control, transportation, and supply with responsibility for determining requirements for facilities, funds and manpower, and further states that such positions are classifiable to the GS-1101 series.

There are no prescribed titles provided by the GS-1101 flysheet. Therefore, in accordance with the guidance discussed in Section III. H. 2. of the *Introduction to the Position Classification Standards*, the agency may designate an official title as appropriate in order to communicate an immediate understanding and identification of the position.

Grade determination

There are also no grade-level criteria provided by the GS-1101 flysheet. In such cases, Section III. I. 1. of the *Introduction* directs us to use grading criteria in a published PCS or functional standard covering a series that has similar kinds of work processes, functions, or subject matter, knowledge and skills, and entails a similar level of difficulty and responsibility. In determining the grade level of the position's analytical work, the agency and CPMS applied the Guide. After a careful review of the record, we concur with its application because the Guide was designed specifically to evaluate "staff analytical duties of positions primarily engaged in line management or program administration," as occurs here in the appellant's staff position, even though "line work" is generally excluded from coverage. The appellant agrees with the agency's crediting of Factors 1 through 9, except for Factor 3, in determining the grade level of the position, and after a thorough review of the record, we concur with the agency's evaluation of the uncontested factors. Therefore, our analysis using the Guide focuses on Factor 3 which the agency credited at Level 3-3.

We also evaluated the appellant's technical business-related duties and responsibilities using the subject matter criteria contained in the GS-1150 PCS because the Guide's grading criteria do not adequately measure the appellant's line technical work. This series includes positions that require primarily a practical knowledge of the nature and operations of a manufacturing nature or those having extensive mechanical production operations. The mechanical production and processing activities in agriculture, forestry, fisheries, mining, and construction are included. These positions include furnishing technical information, assistance, and advice concerning facilities, machinery, methods, materials and standards for industrial production. The appellant's line work requires application of similar technical knowledge.

Evaluation of position using the Guide

The Guide is written in Factor Evaluation System (FES) format. Positions are placed in grades based on their duties, responsibilities, and the qualifications required as evaluated in terms of the nine FES factors common to non-supervisory GS positions. Point values are assigned for each factor, with the total numerical score being converted to a grade level using the grade conversion chart provided in the Guide. Under the FES, the factor point values mark the lower end of the ranges for each factor level. For a position to warrant a given point value, it must be fully equivalent to the overall intent of the description. If the position fails in any significant aspect to meet a particular factor level description, the point value for the next lower factor must be

assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level.

Factor 3, Guidelines

This factor covers the nature of the guidelines used and the judgment needed to apply them.

At Level 3-3, guidelines consist of standard reference material, texts, and manuals covering the application of analytical methods and techniques (statistical, descriptive or evaluative) and instructions and manuals covering the subjects involved (e.g., organizations, equipment, procedures, policies, and regulations). Analytical methods contained in the guidelines are not always directly applicable to specific work assignments. However, precedent studies of similar subjects are available for reference. The employee uses judgment in choosing, interpreting, or adapting available guidelines to specific issues or subjects studied. The employee analyzes the subject and the current guidelines which cover it (e.g., workflow, delegations of authority, or regulatory compliance), and makes recommendations for changes. Included at this level are work assignments in which the subject studied is covered by a wide variety of administrative regulations and procedural guidelines. In such circumstances the employee must use judgment in researching regulations and in determining the relationship between guidelines and organizational efficiency, program effectiveness, or employee productivity.

At Level 3-4, guidelines consist of general administrative policies and management and organizational theories which require considerable adaptation and/or interpretation for application to issues and problems studied. Administrative guidelines usually cover program goals and objectives of the employing organization, such as agency controls on size of work force, productivity targets, and similar objectives. Within the context of broad regulatory guidelines, the employee may refine or develop more specific guidelines such as implementing regulations or methods for the measurement and improvement of effectiveness and productivity in the administration of operating programs. Although these outline the basic processes to be conducted, the methods to be used to complete individual tasks may vary considerably.

We contacted the [installation] Program Manager concerning the type of guidelines available to the appellant. Historically, COE's central office would direct how the divisions and districts would collect needed data, but that has now changed. As the Navigation Business Manager, the appellant's role is to act as interpreter to sub-offices within the District to convey HQ requirements. He works with them to agree on the best methods to acquire and report the data. For example, under the current concept of a business management approach, HQ still sets the parameters of the data needed, but lets the District offices develop their own requirements. Management has found this input by the local offices (the agency calls it "ownership") to be more effective in maintaining a constant stream of data to the central office. The appellant reviews operations to see what areas need improvement and provides appropriate guidance to the lower organizations within the District for action. However, our review of the Business Navigation Program regulations shows they are rigidly defined according to legal stipulations and thoroughly researched by HQ and [installation] before dissemination as to the implications of their enforcement. In addition, because existing metrics are standardized, e.g., the OMBIL

database, it is not possible for the appellant to create new metrics for agency-wide use as described at Level 3-4.

The appellant emphasizes his work as project manager while coordinating the Dredge Replacement Project with the responsibility for replacing the old dredge named “[name]” with the acquisition of the new dredge “[name],” which was put into service in June 2005. He says it was up to him to develop the methodology to define the needs of dredging operations and to list the routine tasks required of the new equipment. He states that he was also assigned responsibility to evaluate and determine the organization structure and to make recommendations on new staffing requirements concerning the new dredge. He says the major purpose of this study was to improve effectiveness and productivity in the dredge operations. While his project work was to ensure the new dredge met the technical needs of the [location] District, it was performed under the restrictions of COE’s Marine Design Team, and it was higher echelons at COE HQ through the [installation] which approved the replacement of the old dredge.

The appellant cites his past job experiences within COE to have also demonstrated an ability to develop and apply various methodologies required to improve efficiency and production in dredging operations within the District. He was also trained specifically in the development of Operations & Maintenance Performance Measures, a leading-edge effort that has subsequently been carried forward to other COE elements. After his training, he instructed senior District managers on how measures should be developed. He says that as a seasoned staffer it is very reasonable to believe that as COE continues with its periodic reorganizations, he will be assigned to lead or participate in similar manpower and production and efficiency improvement studies; for example, he has also assisted with an evaluation of manpower staffing at [location] local locks with the goal of reducing costs and improving efficiencies. However, his training was to interpret for and train other District personnel, rather than the creation and development of agency-wide metrics.

The appellant’s position does not meet Level 3-4. At that level, guidelines consist of general administrative policies and management and organization theories that require considerable adaptation and/or interpretation. Administrative guidelines cover program goals and objectives of the organization. Within the context of broad regulatory guidelines, the employee may refine or develop more specific guidelines such as implementing regulations or methods for the measurement and improvement of effectiveness and productivity in the administration of operating programs. In contrast, the appellant’s position has responsibility for implementation of regulations concerning dredging and its impact on navigation, using the published guidance as described earlier. The guidance and instructions available are more specific than that typical of Level 3-4. His input on proposed legislative change is made to the Division and HQ levels and is considered with input from his counterparts across the agency. In addition, while he may develop local procedures and instructions within the parameters of agency guidance, they may not be considered as interpretations of the broad regulatory guidelines typical of Level 3-4.

The record shows the guidelines used by the appellant include district, division, and agency policies and regulations; state and Federal acquisition regulations, including those administered by the General Services Administration; title 33 of the CFR; and applicable Environmental Protection Agency, Department of Agriculture, and Coast Guard regulations. Typical of Level

3-3, these guidelines address issues relating to the District's navigation business function, specifically dredging. Where analytical methods are not always directly applicable to specific work assignments, court cases and other documents are available for reference. The appellant must use judgment in choosing, interpreting, or adapting available guidelines to specific issues as they relate to the navigation business function. While he is recognized as the local expert in the development of methodologies for implementing HQ directives or providing interpretation of guidance on program planning and evaluation, the policy and regulatory development work is not conducted at the District level, and thus is not an aspect of the appellant's position. He develops guidelines for local implementation when there are new laws or regulations or other events require such issuance, but he does not determine the intent nor is he instrumental in the development or revision of existing regulations. The appellant has numerous manuals and reference materials and has clear access to previous cases studies of legal requirements and administrative or regulatory compliance issues for reference. Therefore, we find the standardized and strict adherence to established guidelines and the availability of numerous precedent studies and practices is consistent with criteria established for Level 3-3.

Factor 3 is evaluated at Level 3-3 and credited with 275 points.

Summary using AAGEG

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	1250
2. Supervisory controls	2-4	450
3. Guidelines	3-3	275
4. Complexity	4-4	225
5. Scope and effect	5-4	225
6. Personal contacts and 7. Purpose of contacts	3-c	180
8. Physical demands	8-1	5
9. Work environment	9-1	5

Total 2615

According to the grade conversion table in the AAGEG, a total of 2615 points falls within the GS-11 grade level point range (2355-2750).

Evaluation of position using the Industrial Specialist Series, GS-1150, PCS.

Classification Criteria

There are three classification factors used to evaluate nonsupervisory position covered by this PCS: (1) Scope and Complexity of Assignment, (2) Availability of Guidelines and Originality Required, and (3) Level of responsibility.

Application of Criteria Contained In the Factors

Positions are evaluated in terms of the criteria presented at the various degrees of the three basic factors. Three degrees of intensity are described for each of the three basic factors. These described degrees are designated "A," "C," and "E." Intermediate degrees "B" and "D" are not described but are intended for use when appropriate. The use of degrees B and D is appropriate when a position clearly falls between two of the described degrees of a particular factor or when for example, a position compares with degree A in some respects and with degree C in others. For ease of converting combinations of the various selected degree levels to appropriate GS-grade levels, point values have been assigned to each degree, i.e., all A degrees have a 2 point value, B degrees – 4 points, C degrees – 6 points, D degrees – 8 points, and E degrees – 10 points. The degree that best characterizes a position is selected for each factor. The point values for each of the three degrees selected are then totaled and the conversion table is used to convert the total point value to the corresponding grade level for a position.

The criteria in the degree definitions below do not reflect level distinctions between different kinds of tasks, but are intended to measure difficulty in terms of the scope and intensity of knowledge required to carry out the duties of a position. These criteria reflect the range of required subject-matter knowledge, corresponding to the nature and range of operations in the industry or industries encompassed in an assignment, to the variety of actions or decisions for which the industrial specialist is responsible, and to the intensity of consideration that he must apply in arriving at such decisions.

The levels depicted for a given complexity or range of industrial operations and processes, under the degrees below, assume the performance of functions that require comprehensive knowledge and consideration in some depth and detail of the production facilities, materials, resources, processes and methods, and the nature and organization of the industry or industries involved. The exercise of such depth of knowledge and consideration regarding the range and variety of industrial operations reflected in typical assignments under Degree E represents much greater responsibility than does the exercise of the same degree of knowledge with respect to the narrow range of operations indicated in Degree A.

Factor 1, Scope and Complexity of Assignment

Assignments at Degree C typically have characteristics of production operations that involve complex machining, heat treating, molding, extruding, milling and similarly complex or sophisticated techniques. The importance of the assigned commodity items to the national economy and the impact of export-import operations upon the industry involved require fairly extensive application of such measures as trade agreements, export-import quotas, or tariffs.

Assignments at Degree E are concerned with materials or products which are complex in nature or use, employed for general consumption, industrial, scientific, or technologically complicated strategic uses. Assignments encompass activities in a number of distinct major industries and require a comprehensive understanding of their organization, operations, and production facilities and processes. End products are composed of a variety of highly specialized components which are produced by different industries, each with its peculiar organizations,

facilities, and processes. An example of such an assignment is the development of the "program," or overall plan and schedule for the contract production of a specific type of supersonic aircraft.

The appellant serves as the focal point for data gathering and analysis that supports project management at the District office. The data is also used to evaluate the efficiency and effectiveness of District dredging operations. The reports track unit costs, workload, and resources and are used to measure how the District compares to other organizations from a financial and production standpoint. The appellant analyzes the reports to identify where inefficiencies exist and provides recommendations to the CO organizations on improving resource utilization. He provides project and program management assistance to construction operations managers by coordinating technical reviews, assuring completion of contract documents, and researching and ordering supplies, materials and equipment. He serves as the District Navigation Business Function Manager in the area of dredging and monitors the obligations and expenditures of the of the PRIP program. The appellant also provides technical review of navigation project documents and recommends possible solutions. However, his work focuses on the evaluation of program effectiveness and is limited to the delivery of program benefits at the operating level. This is similar to and does not exceed the work described by Degree C for Factor 1. While the work contributes to the improvement of productivity, effectiveness, and efficiency in District dredging operations, it does not involve the number of distinct major industries and is more limited than that envisioned by description of work at Degree E in that it does not require or permit the depth of analysis and planning required for evaluation at that level.

Therefore, Factor 1 is evaluated at Degree C (6 points).

Factor 2, Availability of Guidelines and Originality Required

Two premises underlie the definitions of degrees under this factor. The first is that the scope and specificity of available guidelines relate directly to the nature of the mission and the organizational location of the activity or office in which a position is located. Degree progression is not portrayed in terms of organizational level, however, since relationships between levels such as department, bureau, division, field office, and the like vary greatly between departments or agencies, with respect to responsibility for issuing governing regulatory and directive material. The second premise is that the degree of originality required in carrying out assigned functions usually bears a direct relationship to, and is governed by, the extent to which published or stated guidelines apply to or control the work to be done.

At Degree C, the incumbent has responsibility for adaptation and interpretation of program directive material for application to the individual cases or the specific situations which his assignment covers. The position is usually located in an activity which carries out a segment (based, for example, on geographical area, functional phase, or industry subdivision) of a program established and directed by a higher-level organization. The activity in which the position is located operates within the limits of the objectives established by the organization having overall program responsibility. These objectives and the general means of their accomplishment are set forth in various forms, such as mission and policy statements, delegations of authority, and procedural manuals. To apply the governing objectives and

directives to the specific situations with which he deals, the incumbent must thoroughly understand the role of his position in relation to the general aims of the program. He must be cognizant of the characteristics and peculiarities of the particular industry "community" with which his assignments are concerned, and of the immediate effects of his activities upon that community. Guidelines at Degree C are not always directly applicable to specific work assignments, but precedent work records and court cases are available for reference. Administrative guidelines usually cover program goals and objectives, but may require the employee to refine or develop more specific guidelines such as implementing regulations or methods for the measurement and improvement of effectiveness and in providing support to the operating program managers.

At Degree E, the work involves explanation of the needs or purposes which the program must serve with respect to Government and industry; analysis and interpretation of enabling statutes and orders; and translation of these into proposed documents which will govern the operating offices or activities which will carry out the program. In carrying out such assignments, the employee must apply a thorough knowledge of the organization which has responsibility for program direction, its administrative and operational framework, and its specific relationships to other Government agencies having kindred functions and programs. The employee must also have a comprehensive knowledge and understanding of the way in which that segment of industry with which his assignment is concerned (e.g., an entire industry, or those portions of a number of industries involved in the production of complex equipment systems) is affected by the programs of his agency.

Degree C is fully met. The record shows there is considerable latitude at the District level concerning navigation and dredging operations, especially of locks and dams, requiring the appellant to develop numerous local procedures for District operations. We find, however, that guidelines used by the appellant consist of standard reference materials covering the application of analytical methods and techniques relating to the District's dredging and its impact on navigation. This is similar to the description of guidelines available and the originality required at this level.

Degree E is not met. At this level, the employee would have studied the entire industry in the light of the current and foreseeable requirements of the agency. Located in the organizational echelon having overall responsibility for the program for the agency, the employee would develop and recommend the policies and guidelines which the various subordinate offices would follow with regard to procurement and production within the program. This requires anticipation of the overall effect of the program and the action which the agency must take to get the program into operation.

Unlike Degree E, the appellant's work is limited to District activities where he serves as the technical expert for District dredging, and manages the CO Division's plant replacement and equipment management programs. He gathers information, identifies and analyzes issues, develops recommendations to resolve substantive problems that relate to dredging operations affecting a wide range of District field components, and advises local managers. He has responsibility for implementation of regulations concerning dredging and its impact on navigation, using published guidance. However, the guidance and instructions available are

more specific than that typical of Degree E. While the appellant may develop local procedures and instructions within the parameters of agency guidance, they are not considered as interpretations of the broad regulatory guidelines typical of that level. Similar to guidelines described at Degree C, we find the Business Navigation Program regulations are rigidly defined according to legal stipulations and thoroughly researched by HQ and [installation] before dissemination as to the implications of their enforcement. In addition, because existing metrics are standardized; i.e., required by the OMBIL database, the appellant is not vested with the responsibility for or the authority to create new metrics for Corps-wide use.

Therefore, Factor 2 is evaluated at Degree C (6 points).

Factor 3, Level of Responsibility

At Degree C, the incumbent receives supervision mostly in the form of review of completed work, or observation of the results of his work, for adequacy. Upon the assignment of new kinds of work or unusual cases or problems, the incumbent is given general guidance on objectives to be achieved, and on approaches or methods that may be followed in reaching those objectives. Within well-defined bounds of delegated authority, and in accordance with directives that indicate normal courses to be followed, the incumbent takes final action on the cases or problems which constitute the regularly assigned function. The incumbent must be able to discern the non-routine situations which require special attention or policy decisions, and refer such to the proper authority for action. The work entails direct personal contact with management representatives of industrial firms or other Government offices in obtaining information and/or furnishing technical advice or information regarding industrial production methods, controlling legislation or regulations, and similar matters. The incumbent obtains prior instruction from superiors with respect to resolution of problems of unusual nature, or scope, or those which have policy implications.

At Degree E, the work situation requires that the incumbent to develop and recommend the technical methods or approaches to be followed in resolving problems that are not covered by agency guidelines; deal directly with higher-level authorities in the organization and with executives in industry and other Government agencies to explain and gain acceptance of policies, programs, processes and techniques which he develops or recommends; and assume responsibility for commitment of his agency to action of a substantive or technical nature, within the bounds of the mission of the agency and its administrative policies.

The appellant's work fully meets Degree C. Completed projects, evaluations, reports, or recommendations are reviewed by the supervisor for achieving intended objectives and compatibility with organizational goals. Findings and recommendations are normally accepted without significant change. Completed work is also reviewed outside the appellant's immediate office by staff and line management officials whose programs and employees would be affected by implementation of the recommendations. Illustrative of this type of responsibility, the appellant served as project manager to replace the dredge Thompson with the new dredge Goetz. He also coordinates the needs of channel maintenance, technical requirements, and budget appropriations with Division, Design Team, and HQ program managers to successfully accomplish his mission.

Degree E is not met. Assignments of this level normally occur in an activity which has comprehensive responsibility for carrying out a function or program. One example of such an activity is a regional office that has been given responsibility for mobilization planning for a commodity class for an entire military department. In contrast, the appellant's work is limited to providing support to District management for improving District work. In addition, navigation policy is developed at the USACE HQ level, and administered at the [installation] level.

Therefore, Factor 3 is evaluated at Degree C (6 points).

Summary using GS-1150 PCS

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

<i>Factor</i>	<i>Level</i>	<i>Points</i>
Factor 1, Scope and Complexity of Assignment	Degree C	6
Factor 2, Availability of Guidelines and Originality Required	Degree C	6
Factor 3, Level of Responsibility	Degree C	6
Total		18

According to the grade conversion table in the GS-1150 PCS, a total of 18 points falls within the GS-11 grade level point range (18-20).

Summary

Since the position is evaluated at the GS-11 grade level using both the Guide and the GS-1150 PCS, the appellant's position is properly classified at the GS-11 grade level.

Decision

The appellant's position is properly classified as GS-1101-11, with the position title at the agency's discretion.