

**Department of the Interior**

**Office of Human Resources**

**Strategic Talent Programs Division**

**Position Management and Position Classification**

**Policy Handbook**



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## FOREWORD

This Handbook establishes new Department-wide policies and procedures for the General Schedule and Federal Wage System. It provides policy and operational instructions relative to position management and position classification program areas.

Questions regarding the contents of this Handbook may be directed to the Departmental Office of Human Resources, or to the respective Bureau Human Resources Servicing office.

A copy of this Handbook will be available on the Department's Electronic Library of the Interior Policies (ELIPS): <https://elips.doi.gov/ELIPS/Welcome.aspx>

## **Authorities**

The legal and regulatory bases for Classification under the General Schedule are in 5 U.S.C. Chapter 51 and 5 CFR Part 511, which govern Classification under the General Schedule. The legal and regulatory bases for the Job Grading System are in 5 U.S.C. Chapter 53, section 5346 and 5 CFR. Part 532, Subpart F.

Title 5 United States Code (U.S.C.) Chapter 23 Merit System Principles, and Title 5 CFR 335, Promotion and Internal Placement, which ensure equitable treatment for accretion-of-duties situations.

5 CFR 831.901 and 842.801; 5 U.S.C. 5102(c); 5 CFR 300 subpart F; 5 CFR 351, 432, 536, and 752

Personnel Bulletin 17-06 (4/5/17) Revised Cybersecurity Data Standard Coding Structure

Public Law 92-392

*The Classifier's Handbook*, which provides general classification guidance on many different subjects regarding classification.

*Handbook of Occupational Groups and Families* (Part I and II), which provides the full occupational structure established by the U.S. Office of Personnel Management (OPM) for the General Schedule. It lists and defines each occupational group and series in the classification system.

*Digest of Significant Classification Decisions and Opinions*, which contain summaries of classification decisions and opinions, which may have Government-wide impact.

Position Classification Standards, including Job Family Standards and the Introduction to the Position Classification Standards, which are the OPM standards used to classify positions.

## **Applicability**

This policy Handbook governs position management and classification programs and actions through-out the Department of the Interior (DOI).

This document applies to all DOI positions subject to 5 U.S.C. Chapter 51 (General Schedule positions), and Chapter 53 (Federal Wage System positions).

Provisions of this document apply to DOI positions in other pay systems unless specifically exempted by special instructions and authority governing the specific pay system involved.

## **References**

The Guide to Processing Personnel Actions. The Guide to Personnel Recordkeeping. National Initiative for Cybersecurity Education (NICE) Framework. National Archives and Records Administration (NARA) General Records Schedule. OPM FedScope.

## **Summary of Changes/Revisions**

1. 5/15/18 - Page 16, Section 3.2, #5 – “Fish and Wildlife (FWS)” changed to “Federal Wage System”.

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## **1 POSITION MANAGEMENT**

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### **1.1 RESPONSIBILITIES FOR POSITION MANAGEMENT**

Each Bureau and Departmental office (Bureau/Office) will establish and maintain a position management program in conformance with published Departmental policies and hiring controls, as well as applicable Federal human resources laws, rules and regulations. Position management is the assignment of work to positions within an existing or planned organization in a manner that will best achieve mission goals, efficiency of operations, and effective employee utilization within approved resource levels, while also promoting employee development.

Each Bureau/Office will implement position management program requirements that are compatible with its own mission goals and eliminate services, activities or functions that are not core to Department/Bureau mission. Position management plays a key role in long-term strategic workforce reduction plans.

### **1.2 LABOR-MANAGEMENT CONSIDERATIONS**

Bureaus/Offices must fulfill their labor-management obligations, as appropriate, prior to implementing any changes in personnel policies, practices, and working conditions that may result from implementation of processes contained in this Handbook.

### **1.3 GENERAL POSITION MANAGEMENT GUIDELINES**

Position management is a responsibility of management, and manifests itself in the way in which management combines duties and responsibilities, assigns work, and establishes its organizations. Managers must continually assess their organization's ability to fulfill the commitments, goals and objectives that constitute its mission and purpose, and establish enhanced efficiencies and effectiveness within each program. Continual comprehensive evaluations of available resources and capabilities are essential in identifying the organizational changes needed to support mission objectives.

Management must plan the structuring of its positions to achieve and maintain the best possible balance between: mission needs, the need for each position, economy and efficiency, skill and knowledge utilization, attraction and retention of qualified staff, employee motivation and engagement, career development, upward mobility opportunities, and the effectiveness of the structure of the organization. (Merit System Principles (5 USC § 2301)).

A position authorization and control procedure will be established to ensure that existing and proposed work organization and staffing arrangements meet the requirements of good position management and strategic long-term workforce reduction plans. Authorizations and controls must be operated within the numbers of positions, ceiling controls and financial allowances authorized in the budget by Congress, the Office of Management and Budget and the Secretary of the Interior. External factors, e.g., short-term or continued workforce needs based on

reimbursable or other third-party agreements may also be included within position management procedures/decisions.

#### **1.4 ORGANIZATIONAL CHANGES**

Organizational changes will improve the effectiveness and/or efficiency of an organization. They will produce efficiency and economy through the optimum use of staff, while effectively accomplishing the organization's goals and objectives. Management must weigh the cost of proposed changes in terms of benefits derived; reduce unnecessary subdivisions, supervisory levels, and accelerate workflow by broadening supervisory span of control by reducing the number of reviews/approvals, and shortening lines of communication and decision-making.

#### **1.5 ORGANIZATIONAL CHARTS**

Updated staffing table charts/organizational charts (charts) must be maintained. Charts will be approved by an appropriate higher level authority within the Bureau/Office when: new organizations are established; there are major modifications to existing organizations or groups of positions; or there are organizational or position changes that will result in adverse actions to groups of employees. Charts will serve as a guide for the accomplishment of personnel management actions in each Bureau or Departmental office.

#### **1.6 SUPERVISOR TO EMPLOYEE RATIO**

The need for and size of groups and teams should be based upon a sound analysis of the supervisor's span of control (i.e., supervisor-to-employee ratio) and the costs and the benefits of the resulting structure in regards to meeting organizational requirements. Bureaus/Offices will establish and maintain an effective span of control (SOC), with particular emphasis on first-level supervisors. An effective SOC entails, to the extent possible, assigning the maximum number of employees to the fewest number of supervisors while ensuring achievement of organizational goals and program objectives. Effective workforce planning should be pursued to more accurately determine the proper size, composition, and appropriate placement of the workforce. Management is responsible for maintaining appropriate SOCs in accordance with the guidance outlined in this document as well as in line with sound position management and position classification principles.

Within General Schedule organization entities, the absolute minimum baseline limit is one (1) supervisor for every four (4) subordinate employees (1:4). Where feasible, every effort will be made to establish a minimum of one (1) first-level supervisor for every ten (10) employees (1:10). [Government-wide ratio is 1:12, *OPM FedScope data*].

A Federal Wage System organizational entity, will contain a minimum of 15 subordinate employees for every first-level supervisor (1:15), where feasible. The Department supports the consolidation of related operational programs and previously established organizational structures in order to meet these supervisor-to-employee ratios.

### **1.7 MOVEMENT OF EMPLOYEES**

Assignments or reassignments of subordinates to supervisors will be based upon sound position management principles, rather than the effect of additional employees on the supervisor's grade. For example, additional higher-grade employees must not be assigned to a supervisor merely to permit the upgrading of the supervisor's position.

### **1.8 FULL PERFORMANCE LEVEL AND CAREER LADDERS**

The full performance level (FPL) of a position is the highest grade at which enough work exists on a continuing basis to support all employees in the position at that grade level. The sequence of lower graded positions leading to the FPL is a career ladder. Career ladder positions are for permanent appointments, are established to allow for entry at a lower grade level than the FPL of the position and are used to develop employees for the target position. The career ladder refers to the range of grades to which the employee may be promoted non-competitively up to the classified target grade or the FPL of the position. Establishing career ladder positions can optimize efficiency, productivity and organizational effectiveness by broadening the pool of applicants when filling a vacancy for a permanent position. PDs for each grade within a career ladder must meet adequacy standards (see section [2.6](#)).

### **1.9 ASSIGNMENT OF HIGHER-GRADED WORK**

Higher-graded work will be concentrated in the fewest number of positions needed to accomplish the work of the organization, not spread to support higher grades for more employees.

a. Before recommending additional senior working positions, there must be a careful analysis to determine what part of the total amount of work available is above the first full-performance level. Then a determination must be made as to what part of this higher-level workload can be absorbed by the higher-graded position/s already available and concentrated in as few additional higher-graded positions as are absolutely necessary.

b. The assignment of a limited amount of higher-graded work (generally, this will not exceed 20 percent of the direct work time) to lower-graded career ladder positions for developmental purposes is an accepted management practice. Typically, this provides lower-graded employees with an opportunity to demonstrate the potential to perform work at the higher level within their career ladder position.

### **1.10 VACANT POSITIONS**

All vacant positions will be recorded/tracked. A vacant position must be abolished if it is one of several similar positions and other employees can absorb the duties, or if there has been a workload reduction equivalent to that of the vacated position.

When a position is vacated, the appropriate first-line supervisor/management official will review it to see if the position can be eliminated or the work modified and assigned or disbursed to existing position/s.

### **1.11 VICE OR IDENTICAL/ADDITIONAL ACTION**

Vice or identical additional action will not be taken on a position which has been vacant for one year or longer without a recertification.

When a new position will be identical to one or more positions in the same organizational unit, it is an Identical/Additional (I/A) position. The identical position has the same major duties, responsibilities, qualification requirements, organizational patterns and reporting relationships. Standard PDs, classified at various grade levels, may be used for I/A positions. Any proposed classification action that impacts one I/A position will impact all I/A positions in the organization. Therefore, management and Human Resources (HR) will review all impacted positions as part of the position evaluation and before effecting any action.

### **1.12 RELATIONSHIP OF POSITION MANAGEMENT TO POSITION CLASSIFICATION**

The laws that govern the classification system clearly place upon agencies the authority and responsibilities to establish, classify, and manage their own positions. Position management is reflected in the manner in which management builds positions and structures organizational entities. As such, position management encompasses position classification and provides the framework upon which position classifications are based.

Position classification primarily concerns the application of the U.S. Office of Personnel Management's (OPM) position classification standards and principles to job duties and responsibilities assigned by management in order to establish the proper pay plan, title, series, and grade - all of which contribute to a position's rate of pay. Nonetheless, the position classification process is not complete until and unless adequate consideration has been given to position management, both by those authorized to effect changes in organization and job structure (management) and by those qualified and authorized to classify the positions thereby affected (classifiers).

As a result, position management, rather than position classification, is the dominant element influencing the extent to which an organization approaches the maximum efficiency and effectiveness in the utilization of human capital, particularly in terms of financial resources.

While determining job content and organizational structure is the prerogative of management, support entities (including HR staff, finance personnel, and advisory analysts) play a key role in advising and assisting management in carrying out these responsibilities in line with sound position management concepts. A full and open partnership should exist between management and HR personnel in weighing the position management and classification impact and consequences of proposals affecting organization, work assignment, and changes in job content.

## 2 POSITION CLASSIFICATION SYSTEM

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The Position Classification System is based on two fundamental principles:

1. There shall be equal pay for substantially equal work.
2. Variations in pay shall be in proportion to substantial differences in the difficulty, responsibility and qualifications required.

Under the General Schedule (GS) classification system, individual positions are classified to an occupational group, a series representing a specific occupation within that group, and an appropriate grade which has a salary range provided by law. The same applies to the Federal Wage System (FWS) classification except that salary ranges are based on prevailing rates - the rates paid by private employers for similar work in the wage area. The rates are established through geographic wage surveys.

Classification will not be used for recruitment or employee development. Workforce analysis and succession planning, position management, hiring flexibilities and performance management will be used to create clear career paths.

### 2.1 DELEGATED CLASSIFICATION AUTHORITY

Position classification authority is the authority to determine and certify the proper pay plan, title, series, and grade of General Schedule or equivalent positions and Federal Wage System positions.

The Secretary of the Interior's authority for position classification is delegated to the Bureaus/Offices, including the authority to adjudicate classification appeals. This delegated authority cannot be used to change the classification of any position description, title, series, and/or grade of which has been assigned by the Department or OPM; or to create positions contrary to Department standard PDs, position classification guides/standards published by OPM or the Department. Bureau/Office management officials must exercise this authority within budgetary and resource limits and with appropriate reviews, concurrences, and/or approvals that apply to their Bureaus, organizations and programs, and will apply good position management practices.

The Bureaus/Offices may only re-delegate this authority to Human Resources (HR) Specialists. HR Specialists with delegated classification authority must be trained and oriented in all position classification legal and regulatory responsibilities prior to the delegation. Only an HR Specialist who has delegated classification authority may *certify* the classification of a position by signing the Classification/Job Grading Certification section on the position description cover page (e.g. OF-8) (see [5.1](#)).

Bureaus must delegate classification authority in writing. Delegation letters must identify each employee by title, and specify the statutory and regulatory classification responsibilities being delegated. This includes authority to determine and certify the title, pay plan, series and grade of positions in accordance with controlling position classification standards, regulations and

statutory requirements. This authority will not be re-delegated to non-Federal employees. Bureaus will make delegation letters available to the Department upon request.

The purpose of this delegation process is to enhance the personnel management authority of Bureaus/Offices by providing maximum control over the positions within their organizations. Management officials are responsible for ensuring their classification decisions/actions are consistent with laws, OPM classification standards, and DOI policies, guidance and practices.

The Department retains the right to revoke or suspend these delegations.

## **2.2 RESPONSIBILITIES**

Each Bureau (management and HR) will administer an effective position classification program. Standards will be prescribed and controls exercised to ensure that the program conforms to the requirements of applicable laws, rules, regulations, OPM standards and guides, policies of the Department, approved organization plans, and budgetary limitations.

Bureaus will conduct formal, periodic reviews of all positions within their organization to ensure that position descriptions (PDs) are current and accurate and that obsolete PDs are abolished (see 2.9). This review does not absolve the responsibility of managers/supervisors to keep PDs up to date at all times, but rather serves as a systematic approach to ensure gradual changes in assignments have not been overlooked. As positions are vacated, the accuracy and propriety of the classification will be evaluated (see [1.10](#)).

HR professionals with delegated classification authority will ensure that positions are properly classified, and will seek management input to validate the extent to which higher-graded duties are performed relative to the overall duties performed.

A Departmental position classification conflict resolution process is established to resolve disagreements between supervisors and their servicing classifiers at Appendix A.

HR will ensure employees are provided with a current classified PD upon appointment, reassignment, or detail and thereafter when changes are made.

## **2.3 POSITION DESCRIPTIONS(PDs)**

A PD is the official description of management's assignment of major duties, responsibilities, and supervisory relationships to a position. The description of each position must be kept up to date and include information about the job which is significant to its classification. The accuracy of a PD is a shared responsibility between the employee and supervisor, but the supervisor is ultimately responsible for PD accuracy. Statements of difference (SOD) are not official position descriptions.

Generally, it is only necessary to describe the major duties and other important aspects of the position that may affect the final classification. Major duties are those that occupy a significant portion of the employee's time. They will be only those duties currently assigned, observable, identified with the position's purpose and organization, and expected to continue or recur on a regular basis over a period of time, such as one year.

## **2.4 STANDARD POSITION DESCRIPTIONS (SPDs)**

SPDs can be used to cover identical positions in multiple locations of an organization. They follow the same format as the basic PD and generally describe a specific set of duties and responsibilities, at various grade levels that exist in different parts of an organization. If it is appropriate to use a SPD, it must be implemented consistently (see [1.11](#)).

The use of SPDs in no way detracts from management's authority and responsibility to ensure that officially assigned and performed duties and responsibilities accurately match PDs of record for all covered employees. Additionally, using SPDs does not diminish management's responsibility to adhere to position management principles and DOI policies.

## **2.5 DEPARTMENT-ISSUED SPDs**

Bureaus/Offices must use Department-issued SPDs for all applicable positions, unless a waiver has been approved. Requests for exceptions (waivers) will be submitted to DOI OHR for consideration. Requests for exceptions must be in writing, and must show conclusively why the DOI SPD is not applicable to the position/s in question.

DOI SPDs contain official titles. Official titles must be coded into Federal Personnel and Payroll System (FPPS) and be reflected on the incumbent's Standard Form (SF)-50, *Notification of Personnel Action*. The official titles assigned to Department-wide SPDs follow the OPM titling standards. Official titles cannot be changed or modified. The Bureau/Office has the option to assign an organizational/working title that reflects the position's organizational placement or specific program focus.

DOI SPDs do not contain cybersecurity codes. Cybersecurity codes must be determined by the Bureau/Office, and coded into FPPS.

Bureaus/Offices must implement the DOI SPD numbering system for newly established positions when replacing existing PDs with the SPDs. The DOI SPD number must be entered into FPPS, in accordance with Bureau procedures, so it prints on the incumbent's SF-50, *Notification of Personnel Action*. The SPD number is recorded in the cover page attached to each DOI SPD. In order to conform to the position number data field in FPPS, the SPD numbers assigned are seven digits in length.

All Department-wide SPDs include a Position Description Cover page. (See also [PD cover page](#)) The cover page does not reflect every individual position requirement. Bureaus will review and update the cover page prior to use to accurately reflect individual position requirements, as determined by the Bureau/Office.

## **2.6 STANDARDS OF ADEQUACY**

A PD/SPD is considered adequate if it accurately describes at least 80% of major, grade-controlling duties performed and credited.

Narrative PDs are most often used when the classification standard/s covering the position is in a narrative format. However, most classification standards are issued in Factor Evaluation System (FES) format.

All PDs, whether in narrative or FES format, must clearly define the major duties, and the nature and extent of responsibility for carrying out those duties. Major duty areas will contain regular and recurring duties, and will reflect projected percentages of time spent performing those duties. Qualification requirements will be evident from reading the description, and specialized requirements not readily apparent from the description are specifically mentioned and supported by the described duties.

All FES PDs must contain factor level descriptions and the point values for each factor. The series, title and grade must be shown on the PD. The point values for each factor, the total point values, and position standard(s) referenced must be shown on, or attached to the PD. In general, a statement of difference will not meet this standard of adequacy.

Narrative evaluation statements are required for full performance level positions and/or as required by the Bureau/Office.

## **2.7 MINOR DUTIES**

Minor duties normally do not affect the classification of the position, are usually not critical to work operations, and change frequently. A position will be described so as to avoid the need to rewrite the PD when only minor changes in the position occur. It is generally not necessary to include minor duties in the PD. Including a statement within the PD such as, "Performs other Similar Duties as Assigned," adequately covers minor duties.

Sometimes, however, minor duties can influence both grade and series determinations and the qualifications required for the work. In this case, the infrequent but important duties must be described in the PD and evaluated for their effect on classification determinations.

## **2.8 PD AMENDMENTS**

When the major duties of a PD have undergone changes which are material but not sufficient to warrant a complete rewrite of the description, the changes are reported by preparing a PD amendment. Amendments can be used if there is no change in title, series or grade as a result. PDs are amended by means of the DI 625 (<https://www.doi.gov/eforms>) with a statement containing only what is necessary to explain what has been removed or added to the original PD. Use of this form to record position changes is limited to two amendments.

## **2.9 POSITION RECERTIFICATION**

At a minimum, all PDs must be recertified at least once every 5 years.

PDs will be recertified when filling a vacant position, and/or for all personnel actions involving a change in position; e.g., when an employee is appointed, promoted, reassigned, demoted, detailed for more than 120 days, or transferred into the position. This requires managers and

supervisors to certify that the duties and responsibilities of their subordinate PDs are described accurately. Issues identified during the recertification process must be rectified within 1 year.

PDs that are determined to be inaccurate, i.e., they do not adequately describe the duties and responsibilities that an employee is performing, must be re-described and reclassified. If the grade level of a position is determined to be higher, the PD must be rewritten to reflect the higher level duties and/or responsibilities and the position advertised under merit promotion procedures unless all accretion-of-duties criteria at [2.17](#) is met as an exception to the competitive process.

### **2.10 OTHER SIGNIFICANT FACTS**

It is acceptable to include special education, skills or licensures in the PD only if they are required OPM qualifications and directly tied to the knowledge, skill and abilities required to be appointed to the position. This information will be listed under a separate heading entitled, “Other Significant Facts”.

### **2.11 TITLING PRACTICES**

Bureau HR Servicing Offices must follow OPM instructions for constructing official titles. Certain occupational series have prescribed official titles and/or parenthetical titles to identify the line of work within a job family that will not be modified.

Bureau HR Servicing Offices will approve and provide oversight in the establishment of all titles to ensure adherence to occupational series with prescribed official titles, prevent redundancy and ensure consistency in titling practices across offices.

“Confidential Assistant,” “Executive Assistant” or “Special Assistant” are titles reserved for use with positions that provide principal support to political appointees and/or the Senior Executive Service and will not be used to refer to any other position.

### **2.12 GRADE STACKING**

Establishing subordinate positions at the same grade of the supervisor is inconsistent with sound classification and position management principles unless the subordinate positions are classified based on the [Research Grade Evaluation Guide](#) (RGE). This practice is referred to as “grade stacking” and must not be used in a non-research organization, unless a complete narrative evaluation statement has been prepared, approved and authorized by management.

### **2.13 DEVELOPMENTAL OR TRAINEE “LEAD, SUPERVISORY AND MANAGEMENT” POSITIONS**

Lead, supervisory and management positions must be classified under the appropriate guidance (e.g. General Schedule Leader Guide). Developmental or trainee positions are typically established for non-Lead, non-Supervisory and non-Management positions. Creating a multi-graded (developmental, career ladder) supervisory position is inconsistent with the intent of such positions, as well as with performance expectations and sound position classification. Supervisory positions must not be classified at multiple grades. Clear career paths must be established using sound position management and classification principles.

1. There is no mechanism to legitimately create *lead* positions as "trainee" or "developmental." Per the OPM General Schedule Leader Grade Evaluation Guide, classification of a *lead* position is one (1) grade above the highest non-supervisory grade level of the work led. This is not subject to further interpretation and/or manipulation. Creating developmental lead positions must be avoided.
2. It is inappropriate to create a developmental (or trainee) career ladder supervisory position for positions where the grade-controlling standard is the OPM General Schedule Supervisory Guide (GSSG). The GSSG has six factors. Only Factor 3 describes duties assigned and performed. The other five factors describe the nature of the work supervised, the supervisor's reporting chain, the complexity of the work supervised, the contacts with others that flow from the work directed, and the supervisory difficulties associated with supervising in that particular environment. Because five of the six GSSG factors are absolute, there is no mechanism to legitimately construct a trainee or developmental supervisory position that leads to a higher-graded supervisory position. Therefore, creating developmental or trainee career ladder supervisory positions is inappropriate and must be avoided.

Some positions involve supervisory and nonsupervisory work wherein the supervisory responsibilities of the position are not the grade controlling work but are sufficient for GSSG coverage and titling. For example, a position has technical or administrative work that is evaluated at a GS-13, and supervisory duties that place it at a GS-12. This position should be created at the GS-13 grade level. It is inappropriate to create a developmental career ladder (GS-12/13) supervisory position for these types of positions.

Positions that contain the performance of supervisory duties less than 25% of the time are non-supervisory positions. Bureaus/offices have the flexibility to establish career ladders for these types of positions using sound position management and classification principles. At a minimum, each grade level must be fully described in an official position description and supported by a factor-to-factor evaluation statement.

In very rare instances, there may be a need for an exception to the above. Multi-graded supervisory positions must be evaluated on a case-by-case basis. Each grade must be fully described in an official position description, and each position must be supported by a written comprehensive narrative evaluation statement that includes an evaluation of the organizational structure. In these very rare cases, the bureau-level HR officer must review and approve the use of a career ladder. All documentation must be maintained with the PD for reconstruction audit purposes.

3. Management positions are classified based on a combination of factors such as their authority to formulate, determine or influence policy. In general, management positions are classified one or more grades above the base level of technical work performed within the organizational entity they manage. In this context, OPM philosophy and principles hold that "trainee" management positions at whatever level of the management hierarchy

are contrary to sound position management considerations. Therefore, these types of positions must be avoided.

#### **2.14 COLLATERAL DUTY ASSIGNMENTS**

Collateral duty assignments are separate, yet official duties and responsibilities that are assigned to an employee in addition to the primary duties of the position the employee occupies. An example of a collateral duty assignment is Contracting Officer's Representative (COR). Collateral duties have the following characteristics with respect to position classification:

- a. Assignments are distinct and separate from the primary duties and responsibilities of the affected position and do not constitute the primary purpose for establishing or continuing the position;
- b. Assignments do not constitute a grade-controlling duty or responsibility;
- c. Assignment is not a primary duty of the position (it constitutes less than 25% of the employee's work time); and
- d. Assignments are specific to the affected individual employee, not to all incumbents of the same PD.

Management is responsible for initiating and completing collateral duty statements. An official change to a PD is only required when the collateral duty requires a specific skill that is different from those in the original PD and is paramount in influence and weight, or when the collateral duty results in a change to job elements and performance standards of the original PD. The approved collateral duties will be included in official PD of the impacted employee, or documented on the DI-625 form and attached to the PD.

#### **2.15 SPECIAL PROVISIONS**

Bureaus must use Department-issued SPDs for wildland fire positions (see [2.5](#) for specific guidance).

For Firefighter or Law Enforcement Officer (LEO) positions, the HR Servicing Office must assess the classified duties to determine eligibility for special retirement coverage in accordance with [5 C.F.R. 831.901 and 842.801](#). Written requests for coverage will be submitted to DOI OHR. Generally, a PD that is amended to add firefighting or LEO duties would not meet the definition of a primary position.

Firefighter positions require the performance of rigorous work. The Firefighter's primary duties are to perform work directly connected with the control and extinguishment of fires. LEO positions also require the performance of rigorous work. LEO primary duties are the investigation, apprehension or detention of individuals suspected or convicted of offenses against criminal laws of the U.S., or the protection of officials of the U.S. against threats to personal safety. The fact that a position requires a law enforcement commission is not sufficient evidence

that their position is a LEO position. The LEO duties must be performed a substantial amount of time and be the primary purpose for the existence of the position.

## **2.16 DESK AUDIT**

Each Bureau having an HR Servicing Office is required to establish internal desk audit procedures. Written procedures will be available to all employees. At a minimum, desk audits are required:

- (1) for an accretion-of-duties situation, i.e., when an employee's assignments and responsibilities have expanded (see [2.17](#)).
- (2) when requested by management.
- (3) when requested by an employee as part of a complaint process.
- (4) for a classification appeal (see [Section 3](#)).

## **2.17 ACCRETION OF HIGHER-GRADED DUTIES**

An accretion-of-duties is a rare situation when an employee's duties and responsibilities have expanded, which can occur because the scope of the work has increased over time, usually as an evolutionary process and not specifically as a result of management assigning new work or responsibilities, or the impact of the person in the job.

Title 5 U.S.C. Chapter 23 Merit System Principles, and Title 5 CFR 335, Promotion and Internal Placement ensure equitable treatment of all employees for accretion-of-duties situations. 5 CFR 335.103(c)(3)(ii), allows agencies, at their discretion, to exclude from competitive procedures those promotions resulting from an employee's position being classified at a higher grade because of additional duties and responsibilities.

Both OPM and Merit Systems Protection Board recognize the propriety and utility of accretion promotions. Both, however, caution that misuse undermines the trust employees must have in the merit promotion/assignment process, and may result in increased complaints, grievances or violations of Merit System Principles.

Promotions based on accretion of duties are rare occurrences, and used only in those situations where the appropriate basis for an exception to the competitive process exists. Promotions based on job accretion are recognized exceptions to the merit promotion process. Managers, supervisors and servicing HR offices will ensure that a reasonable and accurate career ladder is established before a position is filled. Following good management practices, supervisors must be aware of the duties assigned or assumed by their staff, and exercise vigilance for changes that result in the unintentional growth or erosion of assignments sufficient to affect grade level.

An accretion-of-duty promotion situation requires a desk audit and a comprehensive evaluation statement and must be approved by the applicable Human Resources Director.

In order for an employee to be promoted, using an accretion of duties, as an exception to merit promotion procedures, all of the following criteria must be met:

- a) The employee is not assigned to a Standard PD and/or identical additional position. A promotion based on an accretion of duties involving one incumbent is prohibited when multiple incumbency (“identical-additional”) positions exist within the same organizational unit, and/or when there are other employees in similar positions within the organizational unit. “Organizational unit” is defined as immediate organizational entity, component or group of employees directed by a supervisory position.
- b) The employee is the only one in the organizational unit to whom the additional duties and responsibilities could be assigned and/or who is capable of performing the new duties.
- c) A desk audit was performed. Results are documented in an evaluation statement/report that documents the performance of higher-graded work performed by the employee.
- d) The complexity, range and/or level of difficulty in the duties and responsibilities of a position have gradually increased over a significant period of time (i.e., approximately one year or longer) usually as an evolutionary process and not specifically as a result of management assigning new work or responsibilities, or the impact of the person in the job. The new duties comprise at least 25% of the employee’s time on a regular basis, are based on recurring responsibilities that require a higher level of knowledge, skill and/or ability, and the additional duties are considered major and grade-controlling, not merely new or different work.
- e) The employee continues to perform the same basic functions of the former position, the major duties of the employee’s former position are absorbed into the new position, and the employee’s position description (PD) is re-described incorporating the additional duties and responsibilities.
- f) The additional duties and responsibilities are expected to be performed on a regular basis.
- g) The new position has no further promotion potential.
- h) The promotion is not based on projected duties.
- i) The additional duties and responsibilities do not adversely affect another encumbered position, such as abolishing the position, eroding its current grade or reducing its known promotion potential.
- j) The new position does not involve the addition of supervisory or leader responsibilities (i.e., the position does not change from non-supervisory to a supervisory or leader position).
- k) The new position does not involve reclassification from a one-grade interval series to a two-grade interval series or across occupational series.
- l) The employee meets all qualifications and eligibility requirements for the position.
- m) The proposed upgrade is in conformance with Merit Promotion plans and all other applicable statutes, rules, and regulations.
- n) The impacted employee(s) meet(s) all qualification and time-in-grade requirements (Applies to GS positions only.) [5 CFR 300 subpart F].
- o) A position description is classified for the new position.
- p) Incumbent will be reassigned/promoted to the new position.
- q) There is no reduction-in-force or transfer of function being planned or implemented within the organization.

## **2.18 MISCLASSIFICATION DUE TO NEW CLASSIFICATION STANDARD OR CORRECTION OF CLASSIFICATION ERROR**

If the grade of a position must be reduced because of the application of new OPM classification standards or the correction of a classification error, the agency does not use reduction in force (RIF) procedures. In these situations, the duties of the position do not change; the grade of the position changes because of new classification standards or the correction of the classification error.

## **2.19 RECLASSIFICATION DUE TO JOB EROSION**

“Job erosion” describes a situation where the grade of a position must be reduced, and the position must be reclassified because duties have gradually drifted away through an extended erosion process. In job erosion cases, there is no record of: the reason why the grade-supporting duties of a position are no longer being performed; and the time frame when the change to grade-controlling duties actually occurred.

Job erosion contrasts with a reclassification due to reorganization, where the Bureau carries out a planned change in duties when the record shows: a direct or indirect management decision resulting in the deletion of the grade-supporting duties of a position; and the time frame when management made this decision.

## **2.20 USE OF REDUCTION IN FORCE (RIF) IN JOB EROSION**

The RIF regulations apply to job erosion reclassification actions when:

1. The job erosion downgrading action will take effect after an agency has formally announced a RIF in the employee's competitive area; and
2. The RIF will occur within 180 days after the effective date of the downgrading action.

In deciding whether job erosion is an option, the Bureau/Office must consider whether a RIF has been announced, and will take effect within 180 days, in the employee's competitive area.

## **2.21 REALIGNMENT/REORGANIZATION**

A realignment is the movement of an employee and employee's position when; an organization change (such as reorganization or transfer of function) occurs, the employee stays in the same agency, and there is no change in the employee's position, grade, or pay. Reorganization means the planned elimination, addition, or redistribution of functions or duties in an organization. Bureaus/Offices have the right to conduct a reorganization and a RIF at any time. The regulatory requirements governing RIF procedures are contained in 5 CFR 351.

When organizations reorganize or realign, it is necessary that they consider the impact and effect of proposed changes; i.e., look at changes in light of position management considerations. A carefully designed position structure will result in reasonable and supportable grade levels, and an effective organization structure.

## **2.22 COMPREHENSIVE EVALUATION STATEMENTS**

A comprehensive evaluation statement is a written explanation of how the pay plan, title, series, and grade were determined by the classifier. Comprehensive evaluation statements must be in narrative format. Analysis will reflect the basis for the chosen series, title and grade, and a factor to factor analyses. Statements will be signed and dated by individuals authorized to exercise delegated classification authority.

Bureaus/Offices will submit comprehensive, narrative evaluation statements to the Department for positions undergoing a Departmental classification appeal.

## **2.23 DRAFT AND NEW POSITION CLASSIFICATION STANDARDS**

The DOI/Office of Human Resources (OHR) Branch is responsible for reviewing and providing DOI's comments to OPM on all draft position classification standards. The DOI/OHR Branch will solicit and consolidate comments from Bureau/Office Classification Subject Matter Experts (SMEs).

The Bureaus are responsible for beginning implementation of new or updated OPM position classification standards no later than three months from the official release date and completing it within 12 months from the official release date.

# **3 CLASSIFICATION AND JOB GRADING APPEALS**

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## **3.1 APPELLATE PROCESS**

Each Bureau having an HR Servicing Office with delegated classification authority is required to establish an internal appellant system for classification and job grading appeals. Procedures will permit employees to appeal to an appropriate decision level above the level of authority which graded the position. Written procedures will be available to all employees.

Procedures must make it clear that if he/she files an appeal first with OPM and receives an unfavorable decision, he/she cannot then appeal to the Bureau or Department. The same rule applies within the Department. If the employee files first with the Department and receives an unfavorable decision, he/she cannot then appeal to the Bureau.

The filing of an appeal does not automatically stop the classification action taken by the Bureau on its own motion - the Bureau's policies govern in such cases.

### **Appealable Items**

Employees may appeal the grade, pay plan or occupational series of their own position. In some cases, the title of a position can be appealed if a specific title is authorized in a published standard or guide, or the title reflects a qualification requirement or authorized area of specialization.

## **Non-Appealable Items**

Employees may not appeal the content or accuracy of the duties assigned in their official PD, duties not assigned in their PD, the accuracy of a classification standard, rate of pay, propriety of a wage schedule, a Bureau's proposed classification decision, workload, the classification of positions to which an employee is not officially assigned, the classification of an employee's position based on comparison with other positions, or the classification of positions to which an employee is detailed or temporarily promoted.

### **3.2 DEPARTMENT APPEALS**

All GS employees may forego the Bureau and Department appeal process and file an appeal directly with OPM, in accordance with OPM classification appellant procedures. All OPM decisions are final. There is no further appeal process within the Department or Bureau.

Generally, employees have the following appeal rights.

1. GS employees in Bureaus who elect not to use their Bureau's appeal process may file an appeal to the Department or OPM, but not both at the same time.
2. GS employees in Bureau field offices who choose to file an appeal with their Bureau Headquarters must follow their internal appellant process. If dissatisfied with the Bureau's decision, the employee may file an appeal, in writing, with the Department or OPM but not both at the same time.
3. A GS employee of a Bureau Headquarters may appeal, in writing, directly to the Department or OPM, but not both at the same time.
4. A GS employee of the Department may appeal directly to the Department or OPM, but not both at the same time.
5. All Federal Wage System (wage grade) employees must use the Bureau or Department's appellant process prior to filing an appeal with OPM. If the employee is dissatisfied with the internal decision, s/he may file a subsequent appeal with OPM within 15 calendar days of receiving the decision.
6. Employees assigned to Research or Development positions may file an appeal with their Bureau or OPM. Employees must have a Bureau level classification appeal decision prior to appealing to OPM.
7. Bargaining unit employees will comply with appellate procedures in the negotiated agreement, if applicable. Otherwise, Bureau and/or Department procedures apply.
8. Decisions issued by the Department are final<sup>1</sup>, unless the employee files a subsequent appeal to OPM no later than 15 calendar days following the date of the Department's decision.
9. Employees filing an appeal with OPM must follow instructions provided at [www.opm.gov](http://www.opm.gov).

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<sup>1</sup> An adjudication of higher or lower grade by the Department does not mean the grade of the appellant will automatically go up or down. (See Adjudication of Appeal).

## **Basis for an Appeal**

The Department will decide appeals based solely on the application of published position classification standards. The Department appeals process only deals with the actual duties being performed by the appellant on a regular and recurring basis, and credited within his/her official PD. Issues such as PD inaccuracy (see [2.3](#)), position to position consistency (e.g., an employee cites higher-graded positions which appear to the employee to possess substantially similar duties and responsibilities to his or to her own position), or workload will not be addressed through the Department's appeals process.

The Department will not accept appeals of employees assigned to a Standard PD or I/A position.

## **Designating Representatives**

The appellant may file personally or through a designated representative of his/her choice unless the selected person results in a potential conflict of interest. The appellant's representative shall *not* be:

- (a) A supervisor, whether line or staff, with authority over the position;
- (b) Any official of the agency who has classification authority over the position, i.e., Bureau or HR Servicing Office Specialist; or
- (c) Any official or other employee of the agency whose position involves the performance of duties in human resources management.

The appellant shall notify the Department in writing of the selection of a personal representative. A representative bears the same obligation to cooperate with the Department in processing the appeal as does the appellant. This includes the requirement to provide information in a timely fashion and in the manner specified. The selection of a representative does not convey a right to the representative to be present during any fact finding sessions, nor determine the best method to gather facts about duties, responsibilities and qualification requirements of the appealed position. The representative may submit any information concerning the position which is significant to its classification.

The employee or his/her representative from the Bureau may review the official appeal file maintained at the Department by contacting the deciding official. The Director of OHR will establish the date, time and place where the file can be reviewed.

## **Department Appeal Procedures**

Department appeals will be submitted in writing. Employees filing a Department appeal will work with their servicing HR office to ensure their submission package contains the following information:

1. The employee's name, email address, and the physical address at which the employee desires to receive information concerning the appeal;
2. The current classification of the employee's position and the requested classification (series, title, grade);

3. The employing agency name, division, branch;
4. Name, work email, work address, and work telephone number of the employee's immediate supervisor;
5. A copy of the official, updated PD;
6. A copy of the Bureau's comprehensive evaluation statement/report (see [2.22](#));
7. A copy of the approved, signed and dated organization staffing chart. Staffing charts shall contain each position's title, series and grade.
8. A narrative statement from the employee explaining why he/she believes the current classification should be changed, and any additional supportive information.

Upon receiving notice of a Department appeal, an acknowledgement letter will be sent to the appellant (or representative), and a notification will be sent to the appellant's Bureau. OHR will request missing documents relative to the position from the appellant and/or Bureau. Within 30 days, the appellant and/or Bureau will forward copies of all the information in connection with the adjudication of an appeal to the Department.

### **Cancellation of an Appeal**

The Department will cancel an employee's appeal when the employee requests a cancellation in writing, or when it is learned that the employee is no longer officially assigned to the position, or when the position is abolished. Cancelled appeals at the employee's request will not be reopened. The employee can file directly with OPM.

The appeal will be cancelled if the employee or the representative does not exercise due diligence in moving the appeal forward to final resolution. A cancelled appeal cannot be reopened unless the appellant is able to demonstrate that circumstances beyond his/her control prevented timely movement of the appeal.

### **Reconsideration of Appeal Decision**

A Department appeal decision may be reopened when information is presented, in writing, that establishes a basis such as new, relevant and substantive facts which were not previously considered are identified. The Director of OHR, or designee, may at his/her discretion reopen and reconsider any decision. Requests for reconsideration shall be submitted in writing to the Department no later than 45 calendar days following the date of the original decision.

### **Retroactive Actions**

A classification appeal decision will only be made retroactive if it corrects an error in a classification decision that resulted in an actual decrease in pay. For a decision to be effected retroactively, the employee must appeal the classification decision to OPM no later than 15 calendar days after the effective date of the demotion action.

### **Appeal of a Pay System**

When an appellant requests a determination by the Department as to the proper pay system of his/her current position, the appeal will be decided on the pay system coverage issue

only. Following the determination, the appeal will be returned to the Bureau for a classification determination within the specified pay system. If the employee disagrees with either determination, the employee may then file an appeal with OPM.

### **Adjudication of an Appeal**

Adjudication of an appeal may result in higher, lower or the same grade assigned by the Bureau/Office. An adjudication of higher or lower grade does not mean the grade of the appellant will automatically go up or down. A Bureau/Office has a number of options available to it when complying with a Departmental appeal decision. Regardless of the adjudication decision, the appellant's Bureau/Office retains full control over the assignment of duties to a position and who performs those duties.

If the finding results in *no proposed change to the grade* of the position, but a proposed change only in the title and/or series, management must initiate the appropriate action to update the PD accordingly, and assign the employee to an appropriate PD within four pay periods following the date of the decision.

If appeal findings result in a proposed *increase in grade*, management may elect to upgrade the position non-competitively (provided all criteria are met relative to the Department's and Bureau's policy on accretion of higher-graded duties) or reassign the higher-graded duties from the position and maintain the position's current grade.

If the findings result in a proposed *reduction in grade*, management may elect to assign higher-graded work appropriate to the position in order to sustain its current grade level, or initiate an appropriate personnel action to change the employee to the lower grade. The personnel action must be effective no later than the beginning of the sixth pay period following the date of the decision to change the position to the lower grade (except when a subsequent date is specifically provided in the decision) as permitted by 5 CFR 511.702. The applicable provisions of parts 351, 432, 536, and 752 of title 5, Code of Federal Regulations, must be followed in implementing a reduction in grade. If the appellant is entitled to grade retention, the two-year retention period begins on the date the decision is implemented.

### **Notice of Appeal Rights**

When a Department decision results in a loss in grade, and the Bureau/Office concurs, the Bureau/Office must notify the affected employee of the decision promptly and in writing. The notice must tell the employee about his or her appeal rights to OPM, and specify the time limits within which the employee must file his or her appeal if he or she is to establish or preserve his or her rights to retroactive adjustment.

If not entitled to grade retention, the employee must be notified of his/her right to appeal the change to lower grade action to the Merit Systems Protection Board. Procedures for such an appeal are in [5 C.F.R. §1201.21 through 1201.24](#). Such appeals are appropriate only on the basis that the appealed action does not comply with the law or regulations; disagreement with technical classification decisions shall be addressed under the classification appeal process.

## **Consistency Reviews**

If at any time OHR uncovers information indicating inconsistent classification practices, Bureaus will be directed to conduct a review of potentially similar positions. In such instances, a formal written report will be required for submission to the Director of OHR, or his/her designee, outlining findings on the consistency issue and corrective actions. The Director of OHR will work with Bureau HR offices to establish mutually acceptable time frames for any actions to be taken.

## **4 ACCOUNTABILITY**

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Bureaus are responsible for evaluating and monitoring their performance as it relates to goals established in Strategic Plans. A specific evaluation system will be maintained by each Bureau in cooperation with DOI OHR for carrying out such activities as classification audits, occupational reviews and analyses, staff utilization studies, and similar surveys.

Each Bureau's position management program shall provide for periodic review and analysis to provide essential data as may be requested by the Office of Management and Budget, OPM, Congress, and the DOI OHR. Analyses may include summaries such as the following: review of statistical trend data on the proportion of managerial and supervisory to non-supervisory positions, administrative to program positions, and professional to technical/support positions; examination of the number of positions authorized and the number occupied by GS grade, the average GS grade, the percentage of employees in each GS grade, turnover, promotions, training, career development, incentive awards, and other activities related to staff utilization.

## **5 MISCELLANEOUS**

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### **5.1 PD COVERPAGE**

An updated and accurate PD cover page must accompany all PDs. All cover pages shall include a signature of the supervisor of record, or designee, attesting to the accuracy of the position description. (*The Classifier's Handbook*). The cover page must also be signed by the classifier certifying classification accuracy (see [2.1](#)).

The HR Servicing Office shall complete the PD cover page with accurate and consistent information that includes but is not limited to: Bargaining Unit status, Fair Labor Standards Act (FLSA) exemption status, Position Risk/Sensitivity Level, Cybersecurity codes, etc.

a. Competitive level codes are used to document competitive levels which are groups of interchangeable positions within a Bureau or Office that have the following characteristics: they are in the same grade and occupational series; they are sufficiently alike in duties, responsibilities, pay schedules, working conditions, terms of appointment, and qualification requirements; and the incumbent of any one position could be moved to any other position without undue interruption. These codes shall be accurately assigned prior to implementing a RIF.

b. Position Risk/Sensitivity Level codes are used to document the designated level of security risk and required background investigation based on the duties of the classified PD. [OPM's Position Designation Tool](#) must be used to make an accurate and consistent assessment of all classified positions. An accurate and consistent entry of this information is vital to national security.

c. Cybersecurity position codes [NICE Cybersecurity Workforce Framework | NIST](#) are used to document the designated type of cybersecurity work, if any, is required in the performance of the duties in the classified PD. An accurate and consistent assessment of all positions is required. (PB #17-06)

d. Telework. Telework suitability determinations are made by the supervisor of record and annotated on the PD cover page.

## **5.2 RECORD KEEPING**

Bureau HR Servicing Offices shall maintain a record copy of position descriptions which include information on title, series, grade, duties and responsibilities and all related documents in employees' Electronic Official Personnel Folder (eOPF), consistent with applicable guidance (OPM - The Guide to Personnel Recordkeeping).

The National Archives and Records Administration (NARA) General Records Schedule requires that records pertaining to PDs may be destroyed no sooner than two (2) years after the position is abolished or description is superseded, or longer as applicable (e.g., a related complaint, grievance or appeal is formally closed.)

PDs for positions covered under special retirement rules for law enforcement and firefighters are maintained indefinitely.

Contact your Bureau/Office Records Officer for your retention schedule.

## **APPENDIX A**

### **CONFLICT RESOLUTION PROCESS**

The conflict resolution process is an internal DOI procedure for resolving disagreements with classification determinations between Bureau servicing human resources staffs and their customers (supervisor/manager of position). The procedures are as follows:

1. The first step is to perform an internal second review. This should be an independent review of the classification action by a coworker and/or supervisor. Every effort will be made to resolve issues at this servicing level.
2. In the event there is still disagreement with the outcome following step one, the servicing office HR Officer may elevate the issue to the Bureau Headquarters HR Office. The Bureau's Lead/Senior classifier (or Bureau's recognized subject matter expert) will perform an independent review of the classification action, and render a decision.
3. In the event the issue remains unresolved, the third step will be to seek a final determination rendered at the Department OHR level. This step requires the submission of all pertinent information/documentation to the Department OHR from the applicable management official(s) and the classifiers.
4. The Director, Office of Human Resources will make the final determination.