Background and Purpose of the Following Draft Directive and Standard (D&S)  
*Position Classification and Position Management* (HRM 15-02)

The goal of preparing this D&S and providing stakeholders with the opportunity to comment on it in draft form is to establish requirements for evaluating and establishing General Schedule (GS) and Federal Wage System (FWS) positions, including the application of sound position management principles. Also, to establish employee position classification appeal requirements for GS and FWS positions; a resolution process for contested classification validation determinations; and a process for consistency reviews and establishing standard position descriptions (SPD). This release clarifies laws, regulations, and requirements for and educates employees, servicing human resources (HR) offices, and line management about the principles and requirements of position classification and position management.

This release was developed in coordination with Reclamation’s functional work group for position classification and position management which consists of Human Resources (HR) specialists throughout Reclamation with delegated position classification authority. The work group had opportunities to review, comment, and contribute to the drafting of the major revision. In addition, multiple meetings were held with Reclamation’s HR Officers from each servicing HR office to review, discuss, and address issues, concerns, and suggested changes to the draft major revision.

The Reclamation Manual is used to clarify program responsibility and authority and to document internal Reclamation-wide methods of doing business. All requirements in the Reclamation Manual are mandatory.

See the following pages for the draft D&S.
Reclamation Manual
Directives and Standards

Subject: Position Classification and Position Management

Purpose: Establishes requirements for evaluating and establishing General Schedule (GS) and Federal Wage System (FWS) positions, including the application of sound position management principles. Also establishes employee position classification appeal requirements for GS and FWS positions; a resolution process for contested classification validation determinations; and a process for consistency reviews and establishing standard position descriptions (SPD). The benefits of this release are that it clarifies laws, regulations, and requirements for and educates employees, servicing human resources (HR) offices, and line management about the principles and requirements of position classification and position management.


Approving Official: Deputy Commissioner, Policy, Administration, and Budget

Contact: Human Resources Division, Human Resources Policy Office (84-12100)

1. **Introduction.** The position classification system is based on two fundamental principles: 1) equal pay grade for substantially equal work; and 2) variations in pay will be in proportion to substantial differences in the difficulty, responsibility, and qualifications required by the position. Position management addresses management’s responsibility to structure and manage functions, positions, and organizations in a way that optimizes efficiency,
productivity, and organizational effectiveness while maintaining the lowest possible costs. Position management is the foundation for position classification. This Directive and Standard (D&S) establishes position classification and position management requirements and procedures for both GS and FWS positions consistent with overall functional objectives and with Reclamation, Departmental, and OPM requirements. Furthermore, this D&S explains the requirements, conditions, and procedures for employee position classification appeals and for the resolution of contested classification validation determinations. In other words, should an employee disagree with the position classification determination of their position, the employee may choose to submit an employee position classification appeal; and should a servicing HR office not receive classification validation and resolution cannot be reached informally, the servicing HR office may choose to submit a request for third-party review. In both cases, servicing HR offices may be required, as instructed, to conduct consistency reviews based on the decisions rendered.

2. **Applicability.** This release applies to GS and FWS positions within Reclamation, as well as to those employees within Reclamation with delegated position classification authority. This release applies to managers and supervisors who write position descriptions (PD) for and establish positions in the GS and FWS. Additionally, this release applies to GS and FWS employees submitting employee position classification appeal(s) and to servicing HR offices requesting resolution of contested classification validation determinations, implementing position classification appeal decisions and classification validation determinations, and implementing consistency reviews. Positions and employees covered by collective bargaining agreements may have other applicable requirements.

3. **Delegation of Position Classification Authority.**

   A. Position Classification Authority is delegated as described in Reclamation Manual (RM), *Delegations of Authority*, 4.I.(1)(d).

   B. Re-delegations of authority must be documented as described in RM, *Delegations of Authority*, 3.E., and in the Policy Handbook, Section 2.1 *Delegated Classification Authority*.

   C. In addition to Paragraph 3.B., delegations of authority must be documented in writing, identifying each employee by name and title and specifying the classification authority and responsibilities being delegated (e.g., position classification authority to evaluate and certify position classification determinations up to and including GS-12 for GS determinations and for all grades within the FWS). Original documentation must be filed and maintained by the delegating official and made available upon request.

      (1) A copy of the written delegation of authority must be provided to the employee and to HRPO using appeals@usbr.gov.

      (2) Employees with delegated position classification authority must be trained and oriented in position management and position classification principles and in their
legal and regulatory responsibilities prior to delegation as described in RM, *Delegations of Authority*, Paragraph 4.I.(1)(d).

(3) Under the direction of the Human Capital Officer (HCO), HRPO will formally and periodically review position classification determinations and organizational structures throughout Reclamation to ensure that position management and position classification principles, practices, and policies are being carried out consistently and appropriately.

(4) The HCO retains the right to revoke or suspend position classification delegations of authority throughout Reclamation.

4. **Positions Requiring Review, Clearance, Validation, and/or Approval Prior to Recruitment and/or Finalization of Position Classification Actions.**

   A. To establish positions graded GS-14 or higher, including equivalency in the FWS based on level of responsibilities, refer to RM D&S, *Clearance Process for Positions Graded GS-14 and Higher* (HRM 04-03).

   B. Classification validation is required prior to finalization of position classification actions for PDs that include any of the following: PDs that include Factor Evaluation System (FES) factor levels of 1-8 or 1-9 (Knowledge Required by the Position), or 5-5 or 5-6 (Scope and Effect); and/or any PD below the GS-14 grade level that includes factor level 2-5 (Supervisory Controls). Refer to RM, *Delegations of Authority*, 4.I.(1)(d)(ii).

   (1) For PDs requiring classification validation, servicing HR offices will submit the PD, evaluation statement, organization chart reflecting the position’s organizational context, and signed PD cover page to HRPO at appeals@usbr.gov. The servicing HR Officer must either send or be copied on the email.

   (a) HRPO will review and evaluate the information and request additional information, as necessary, in order to complete the classification validation review. HRPO will communicate the results of the review to the servicing HR office with a written classification validation statement and by initialing validation on the PD cover page.

   (b) If HRPO does not concur nor validate the factor level evaluation and the servicing HR office disagrees, the servicing HR office and HRPO will discuss the evaluation and try to resolve differences informally. If differences cannot be resolved, the servicing HR office may submit a written request for third-party review as described in Paragraph 11. *Resolution Process for Contested Classification Validation Determinations.*
(c) The classification validation statement and PD cover page will be included and maintained with the PD, evaluation statement, and other documentation maintained with the original PD.

(d) SPDs from the Department or Reclamation are exempt from the classification validation process. However, other internal control measures as communicated by implementing instructions for the specific SPDs must be followed. See Paragraph 4.I.

C. Prior approval by the Department’s Office of Communications (OCO) is required prior to establishing or changing a PD as described in RM D&S, Positions in Professional Public Affairs Positions and Other Related Positions (ADM 03-03). The supervisor of the position must provide written documentation of the approval to the servicing HR office. The servicing HR office must attach the documentation to the original PD.

D. Prior advice and consent by the Department’s Office of Civil Rights is required with respect to the appointment, retention, and release of Equal Opportunity Officers for the Department’s bureaus and offices per Departmental Manual (DM), 112 DM19, 19.3E.

E. Prior approval by the Department’s HR Policy Director is required for any personnel appointment or change involving the principal personnel officer in a bureau or office per 370 DM311, 1.8B(3) and PB No. 00-4 (311) Personnel Officer Positions – “Personnel Appointment or Change”.

F. Approval is required for reclassification of positions significantly engaged in Information Management and Technology, per Departmental guidance, as outlined in RM D&S, Information Management and Technology (IMT) Position Hiring Controls (IRM 05-01).

G. PDs having firefighter and/or law enforcement duties must be evaluated by the Department for possible special retirement coverage recommendation. Servicing HR offices will evaluate, recommend, and maintain such PDs based on and following the guidance found at https://www.doi.gov/flert/. Servicing HR offices will work through HRPO for Department evaluation and decision.

H. PDs containing major duty assignments that are outside of the servicing HR office’s area of responsibility (e.g., regional positions containing Reclamation-wide level work or Reclamation positions containing Department level work), must have those major duty assignments and associated percentages of time approved in writing (e.g., email from program manager) by the appropriate program manager (e.g., Reclamation-wide electric reliability auditing work being performed in a region would need to be approved by the Manager, Power Resources Office).
(1) For Reclamation-wide work being officially described by, assigned to, and evaluated by a regional office or by an office outside of the program chain of command, the servicing HR office will proceed as follows:

(a) The supervisor of the position and the servicing HR office for the position will collaboratively gather information and approval, in writing, from the program manager responsible for the work to include: specific major duty statement(s) along with percentages of time spent on the major duties along with the related knowledge, skills, and abilities; judgment used; complexities involved; scope and effect; and other evaluative factors related to the specific Reclamation-wide major duties. The written information from the manager will be included with the PD and evaluation statement. The evaluation statement for the position will clearly and separately evaluate the Reclamation-wide work.

(b) The PD will be approved by the program manager prior to recruitment regardless of having prior approvals, unless the approval was granted within the last 6 months (i.e., each time the position is recruited for, the review and approval process by the program manager must be followed unless review and approval took place within less than 6 months).

(c) The Reclamation program manager over the Reclamation-wide work being performed, will annotate the position on their organization chart with the associated percentage of time that the position is performing work for that organization; and the manager will also provide performance evaluation feedback to the supervisor of record in regard to work assignments being performed by the employee in the position for that program manager.

(2) For Department work being officially described by and assigned to PDs within Reclamation, the supervisor of record and the servicing HR office must follow steps in Paragraphs 4.H.1.(a-b) in relation to Department work.

I. To ensure that principles of position management and equal pay grade for substantially equal work are fully considered, supervisors outside of the program chain of command must request and receive written authorization from the specified Reclamation program manager prior to using GS-13 level and above SPDs. Program managers are identified in SPD specific implementing instructions (e.g., use of acquisition management GS-13 SPDs must be authorized by Reclamation’s Procurement Chief).

(1) Authorization for using GS-13 and above SPDs will include a statement from the Reclamation program manager that the major duties; knowledge, skills, and abilities; judgment used; position complexities; and position’s scope and effect as described in the SPD are aligned with program expectations and work assignments of the requesting organization.
(2) The written authorization from the Reclamation program manager will be maintained with the PD and must be requested and received for each recruitment or staffing action using GS-13 and above SPDs.

(3) If the work in the SPD is Reclamation level work as described under Paragraph 4.H., the requirement stated under Paragraph 4.H.1.(c) must be applied.

5. Position Management.

A. Functional statements must be developed by managers and supervisors for all major organizational components (e.g., area office and its major components such as field offices and divisions).

(1) Functional statements must be developed prior to the establishment of a new organization code.

(2) Functional statements of the broader organization (e.g., Area Office, Regional Office, Divisions within a Directorate) must be reviewed by managers and classifiers when a new organization code within the broader organization is established or when preparing for a reorganization to ensure that there is not an overlap or gap in roles and responsibilities nor impact to positions.

(3) Functional statements will be reviewed and updated by the Reclamation Leadership Team (RLT) every 4 years.

(4) Servicing HR offices will coordinate the collection of functional statements and will store the final functional statements.

B. For purposes of carrying out the servicing HR office role of position management requirements in the Policy Handbook, Section 1 Position Management, the base line data to be used by servicing HR offices will be the annual Federal Activities Inventory Reform (FAIR) Inventory prepared by the Mission Support Organization.

(1) Staffing tables or organizational charts will be established by the servicing HR office using the annual FAIR inventory data as the base line data for authorized and budgeted positions.

(2) Servicing HR offices will establish internal procedures for maintaining tables or charts, including tracking vacant positions, as required by the Policy Handbook Section 1.5 Organizational Charts and Section 1.10 Vacant Positions.

C. Organizational changes will improve the effectiveness and efficiency of an organization as required by the Policy Handbook, Section 1.4 Organizational Changes. Managers and supervisors will work collaboratively with, and under the advisement of, their servicing HR office to ensure Merit System Principles are followed and to ensure
sound application of position management and position classification principles and requirements (outlined in the Policy Handbook) to:

(1) Ensure labor-management obligations are fulfilled, where applicable. Refer to Section 1.2 Labor-Management Considerations.

(2) Ensure changes result in reasonable and supportable grade levels and an effective organizational structure. Refer to Section 2.21 Realignment/Reorganization.

(3) Ensure structures align toward organizational commitments, goals, objectives, mission, and purpose and ensure application of Merit System Principles. Refer to Section 1.3 General Position Management Guidelines and Section 1.7 Movement of Employees.

(4) Ensure organizational changes comply with minimum supervisor-to-employee ratios and the principles behind effective spans of control. Refer to Section 1.6 Supervisor to Employee Ratio.

(5) Evaluate positions to: 1) Ensure concentration of higher-graded duties in the fewest number of positions needed to accomplish the work. Refer to Section 1.9 Assignment of Higher-Graded Work. 2) Review for potential elimination, modification, or redistribution of work. Refer to Section 1.10 Vacant Positions. 3) Evaluate impacts from changes to Identical/Additional PDs. Refer to Section 1.11 Vice or Identical/Additional Action. 4) Ensure proper recertification of PDs. Refer to Section 2.9 Position Recertification.

(6) Develop PDs required for the organizational changes. Refer to this D&S Paragraph 7. Writing Position Descriptions.

(7) Establish functional statements as required in this D&S Paragraphs 5.A.(1) and (2).

(8) Follow established internal procedures for updating staffing tables or organization charts as described in this D&S Paragraph 5.B.(2) and in the Policy Handbook, Section 1.5 Organizational Charts.

6. **Reclamation Standard Position Descriptions.**

   A. Reclamation will align its SPD policy with the Department’s as described in the Policy Handbook, Section 2.5 Department-Issued SPDs and Section 2.6 Standards of Adequacy.

   (1) Servicing HR offices must review new PDs to ensure the work assignments are not already covered by an SPD issued by the Department or Reclamation.
(2) Official titles, position numbers, and other requirements documented on the PD cover page or SPD must be used and coded appropriately in the Federal Personnel and Payroll System (FPPS).

(3) Servicing HR offices will review and update the PD cover page prior to use to accurately reflect requirements not addressed as part of the SPD and will ensure proper documentation is attached (e.g., cybersecurity checklist) to the SPD as addressed in Paragraph 7, Writing Position Descriptions and Paragraph 8, Evaluating and Certifying Positions.

(4) The PD cover page of the SPD must be certified by the supervisor that the SPD and its major duties and responsibilities and its organizational role and context are accurate and that principles of position management have been applied.

(5) Requests for exceptions to using established Reclamation SPDs will be submitted in writing to the HCO for consideration and determination.

B. Based on feedback from the servicing HR offices and HRPO and feedback from technical teams, program managers, and the RLT, the HCO will determine which SPDs to develop.

(1) The HCO will assign SPD development to HRPO; designating which SPDs to develop and the priority order of development.

(2) HRPO will assemble, lead, and coordinate with a team of subject matter experts (SME) representing a cross-section of Reclamation organizations to develop assigned SPDs. SMEs will keep their RLT member(s) informed of the development progress.

(3) Once a draft SPD has been developed, HRPO will distribute the draft to servicing HR offices for HR review and for broader SME review and commenting, including review and commenting from their RLT member(s). Servicing HR offices and/or the SME team will coordinate the review and comment process and provide HRPO with a consolidated analysis of comments.

(4) HRPO will work with the SME team to address the comments and finalize the SPD along with the additional career ladder SPDs.

C. The HCO will issue finalized SPDs as an appendix to this D&S as a minor revision. The SPDs are in effect once the minor revision has been implemented.

(1) Once implemented, servicing HR offices and supervisors must immediately use the SPDs for new appointments.
Once implemented, servicing HR offices and supervisors must review existing positions for applicability, and process the necessary reassignment actions as soon as possible, but no later than 90 days from the effective date of the minor revision. Exceptions to the implementation deadline will be submitted in writing to the HCO for consideration and determination.

7. **Writing Position Descriptions.**

   A. PDs are prepared collaboratively by both supervisors and classifiers (PB No. 18-03 outlines responsibilities). PDs must meet the standards of adequacy and quality as described in Chapter 3. “Position Descriptions” in *The Classifier’s Handbook*, and in the Policy Handbook, Section 2 *Position Classification System*.

   B. A position description is a forthright presentation of the work assigned by management to the position and contains the following information:

   1. **Introduction** – a statement of the primary purpose of the position and its relationship to the organization.

   2. **Major Duties** – statements of work that represent the primary purpose for a position’s existence and govern the qualification requirements; the significant, regular and recurring duties and responsibilities assigned to the position by the supervisor.

      a. Major duties must include the percentage of time spent performing each major duty listed in the PD;

      b. The major duties section must include the statement of “Performs other duties as assigned.”

      c. Critical elements in the Employee Performance Appraisal Plan (EPAP) must relate to major duties and responsibilities as described in RM D&S *Performance Management* (HRM 07-01).

      d. Minor duties that are important to the overall work may also be added to the PD in accordance with the Policy Handbook, Section 2.7 *Minor Duties*.

      e. Collateral duty assignments will be addressed as described in the Policy Handbook, Section 2.14 *Collateral Duty Assignments*.

      f. For supervisory positions written in formats following either the General Schedule Supervisory Guide (GSSG) or the FWS Job Grading Standard for Supervisors, major duties must be described as follows:
(i) Personally performed, nonsupervisory major duties must be included in the PD along with the percentage of time spent performing each duty described. This does not include major duties performed by subordinate employees.

(ii) Supervisory responsibilities and authorities (i.e., supervision of employees and program work directed) must be described under the applicable factors, following the format of the applicable supervisory guide or standard (e.g., for the GSSG format the program work directed is described under Factor 1 and the supervisory and managerial authority exercised is described under Factor 3).

(iii) The PD must include the percentage of time spent performing the supervisory responsibilities described and evaluated under Factor 3, Supervisory and Managerial Authority Exercised, in the GSSG for GS supervisors, or under Factor 1, Nature of Supervisory Responsibility, in the FWS supervisory standard for FWS supervisors. This percentage is to be used for coverage determination and may overlap the percentage of time spent on program work directed.

(3) Knowledge Required by the Position and Competencies – the kind and level of knowledge, skills, and abilities (KSAs) needed to perform the major duties and how they are used in performing the work.

(a) When applicable, PDs must also include special knowledge or skill requirements that are essential to successful performance of the position and would be used to support specialized experience and selective placement factors for recruitment.

(4) For GS nonsupervisory PDs evaluated using FES classification standards, the PD must also include descriptions of the remaining FES factors that must directly align with and be supported by the major duties and primary purpose of the position. The remaining FES factors are: Supervisory Controls, Guidelines, Complexity, Scope and Effect, Personal Contacts, Purpose of Contacts, Physical Demands, and Work Environment.

(5) For GS nonsupervisory PDs evaluated using narrative classification standards, the PD must include information supporting and may follow the format of the narrative standard (e.g., nature of assignment, level of responsibility), or the PD may be written in FES format. If written in narrative format, the PD must also include a description of the KSAs as described in Paragraph 7.B.(3), and physical demands and work environment as described in Paragraph 7.B.(8).

(6) For FWS nonsupervisory PDs, the PD must also include the remaining descriptions of Responsibility, Physical Effort, and Working Conditions. These
descriptions must directly align with and be supported by the major duties and
primary purpose of the position.

(7)  For supervisory positions, the PD must also include information for and must
follow the format of the supervisory standard being used (e.g., program scope and
effect, organizational setting, nature of supervisory responsibility, and level of
work supervised), and must also include additional factors (e.g., FES format) if
the grade is based on the nonsupervisory work. The PD must include a
description of the KSAs as described in Paragraph 7.B.(3), and physical demands
and work environment as described in Paragraph 7.B.(8).

(8)  Work Environment/Working Conditions and Physical Demands/Physical Effort
must be supported by the major duties and must include travel requirements as
follows:

(a)  Overnight travel requirements and estimated percentage of time spent
traveling overnight will be described under Work Environment/Working
Conditions or at the end of PDs written in supervisory or narrative formats.

(b)  Travel requirements and estimated percentage of time spent traveling to and
working at off-site work sites (e.g., construction sites) and associated work
site environments will be described under Work Environment/Working
Conditions or at the end of PDs written in supervisory or narrative formats
(e.g., position involves travel, approximately 25% of the time, during the
work day for site visits which involve walking over rough or uneven terrain
near riverbanks and/or shorelines in a variety of weather conditions and
require the use of safety equipment and the strict observance of safety rules
and practices for the site; position involves occasional, less than 10% of the
time, travel during the work day for site inspections which typically involves
working around moving machinery and/or heavy equipment and high voltage
power generating equipment and requires the use of safety equipment and the
strict adherence to safety rules and practices).

(c)  Physical demands associated with travel will be addressed under Physical
Demands/Physical Effort or at the end of PDs written in supervisory or
narrative formats (e.g., while conducting site visits must be able to traverse
uneven terrain and lift equipment weighing less than 20 pounds; while
conducting site inspections must be able to bend, stoop, crawl through
confined spaces, climb ladders).

(9)  The section “Other Significant Facts” may be added at the end of the PD as
explained in the Policy Handbook, Section 2.10 Other Significant Facts. This
section will include requirements of the position only if they are required OPM
qualifications and directly tie to the major duties and knowledge, skills, and
abilities required to be appointed to the position.
C. Career Ladder. PDs for career ladder positions below the full performance level (FPL) must include all the information in Paragraph 7.B. Supervisory, lead, and management positions will not have career ladders as described in the Policy Handbook, Section 2.13 Developmental or Trainee ‘‘Lead, Supervisory and Management’’ Positions.

D. Standard PDs. Positions that are covered by SPDs must be implemented in accordance with the Policy Handbook, applicable Personnel Bulletins, Paragraph 6. Reclamation Standard Position Descriptions, and implementing instructions that accompanied the SPD.

E. Details and Temporary Promotions. PDs used for detail and temporary promotion actions must be written as described in Paragraph 7.B. and evaluated and certified in accordance with Paragraph 8. Evaluating and Certifying Positions, with the exception of details to unclassified duties.

(1) Details to unclassified duties actions will require the supervisor to submit to their servicing HR office a statement of duties the employee will perform during this temporary detail assignment. A copy of the statement of duties will be provided to the employee.

(2) Details to unclassified duties extending beyond 6 months must be approved by the HCO. Supervisors will provide justification for the extension request to their servicing HR office who will forward the request and justification for extension to the HCO at appeals@usbr.gov.


A. Positions will be evaluated for final position classification determination consistent with applicable laws, rules, regulations, principles, OPM position classification standards and guides, Department policies, and Reclamation policies, criteria, and guidance. Only those with delegated classification authority may certify a final position classification determination.

(1) Positions in the Pathways Programs will be written as described in Paragraph 7. Writing Position Descriptions, and evaluated and classified in accordance with applicable OPM and Department policy and/or guidance. OPM’s Pathways Program Handbook dated August 2016, page 16, provides classification guidance as does PB No. 13-04 The Department of the Interior Pathways Programs.

(2) Titling practices will follow requirements in the Policy Handbook and OPM guidance and position classification standards. Constructed official titles will be developed consistent with titling practices throughout Reclamation to ensure consistent understanding and meaning of work associated with titles.
B. Evaluation statements will be written for and attached to all positions covered by the GS and the FWS. The servicing HR office has discretion in choosing the format for evaluation statements, but evaluation statements must be consistent with requirements in the Policy Handbook and must contain the following information:

1. Reference to the OPM position classification standard(s) and/or functional guide(s) and other reference information used in the position classification evaluation; the issue date of the referenced classification standards and/or functional guides; an explanation of why the specific standard(s) or guide(s) were selected to derive the position classification determination of the position;

2. Background information identifying why the position is being evaluated or established or explaining the significant changes if the position is being re-described or re-evaluated; organizational context; and position management information and analysis associated with the Policy Handbook, Section 1. Position Management.

3. Series, title, and grade determinations, including identifying the variety of series considered, point values (or other grading criteria) for each factor, total points overall, and the derived grade level, including the analysis leading up to and justifications for the final position classification determination;

4. For supervisory or lead positions, analysis of base level of work supervised or led, clearly showing the method and positions used to derive the base level (see Appendix A. Calculating Highest Qualifying Level of Work Directed – Base Level);

5. For supervisory or lead positions, analysis and documentation of the position classification determination for the technical work performed by the position that is nonsupervisory or not covered by the leader position classification standard; and

6. The final classification determination, including functional classification code (e.g., the position is evaluated as a Civil Engineer (21), GS-0810-11).

7. For grade stacking positions, the evaluation must address the requirements described in the Policy Handbook, Section 2.12 Grade Stacking, and its associated Frequently Asked Questions (FAQs) and must be approved and authorized by the HCO, who may delegate the authority to HR Officers. The HR Officers may not re-delegate this authority. The grade stacking approval must be in writing with signature and date.

8. For promotion actions based on accretion of higher-graded duties, evaluation of the position must include all the requirements and address the criteria in the Policy Handbook, Section 2.17 Accretion of Higher-Graded Duties, and must be
approved and authorized by the HCO, who may delegate the authority to HR Officers. The HR Officers may not re-delegate this authority. The approval for accretion must be in writing with signature and date.

C. Final position classification determinations will be documented and certified using the approved PD cover page in accordance with requirements in the Policy Handbook and the following:

(1) Final position classification will be documented on the “Second Level Review” line for servicing HR offices.

(2) Supervisors must sign the PD cover page certifying the accuracy and adequacy of the PD prior to the Classifier signing the PD cover page.

(3) Only classifiers with delegated classification authority commensurate with the final position classification determination may certify the PD cover page.

(4) The final, certified PD cover page must remain with the certified PD that was evaluated. Should the PD be changed, with the exception of pen and ink changes as described in Paragraph 9.C.(3), a new PD cover page must be created and certified and attached to the changed PD.

D. Determinations of FLSA exemption status will be made and documented on the PD cover page and in FPPS for all positions. A completed Reclamation Form No. 7-2660, FLSA Designation Worksheet, will be maintained with the PD for 1) all supervisory positions; 2) all GS positions at grades GS-11 and above; and 3) all positions determined to be Exempt from the FLSA.

E. Position sensitivity and position risk designations for all covered positions will be made using the Position Designation Automated Tool (PDT) and using the Reclamation guidance found in RM D&S, Personnel Security and Suitability (SLE 01-01). Designations will be documented on the PD cover page and in FPPS, and by attaching the Position Designation Record, printed from the PDT, to the PD. Position Designation Records must include the name of the designator and be dated at the time of the designation.

F. Determinations of whether a position requires career employees to file a Confidential Financial Disclosure Report (OGE-450) will be made using guidance from Interior and Reclamation, as well as 5 C.F.R §2634.904. Position-based determinations will be documented on the PD cover page and in FPPS.

G. Positions requiring professional registration for engineers and architects will be identified and documented using the criteria in RM D&S, Professional Registration for Engineers and Architects (HRM 05-01).
H. Cybersecurity Data Standard Codes will be assigned to all positions by using the NICE Cybersecurity Workforce Framework and Reclamation Form No. 7-2674 *Cybersecurity Data Standard Code Determination Checklist*. Completed checklists will be attached to all PDs and Cybersecurity Data Standard Codes will be documented on the PD cover page and in FPPS.

I. Bargaining Unit Status (BUS) Codes will be determined and documented on the PD cover page and in FPPS.

J. Drug Testing Designated Positions (TDP) will be determined based on applicable regulations and the Department’s and Reclamation’s policy and guidance and will be documented on the PD cover page and in FPPS.

K. Medical standards or medical surveillance requirements will be determined using the most applicable regulation, policy, and guidance and will be documented on the PD cover page.

L. Telework suitability will be determined based on PB No. 19-02 *Telework Program* and will be documented on the PD cover page and in FPPS.

M. Competitive Area Codes will be determined by the servicing HR office in accordance with applicable OPM, Department, and Reclamation policy and/or guidance and will be documented on the PD cover page and in FPPS. Refer to OPM’s *Workforce Reshaping Operations Handbook* dated March 2017, and PB No. 12-09 *Establishing and Maintaining Competitive Areas*.

N. Competitive Level Codes will be determined and documented on the PD cover page as required in the Policy Handbook and as explained in OPM’s *Workforce Reshaping Operations Handbook* dated March 2017.

O. Position requirement determinations (e.g., driver’s license, commercial driver’s license, and required occupancy) that are not documented on the PD as described in this D&S Paragraph 7.B.(9), will be documented on the PD cover page in the Remarks section. Position requirement determinations must be documented with evaluation of defensible criteria for establishing the requirement.

P. All PDs must be recertified as required in the Policy Handbook and as further described in this D&S in Paragraph 9. *Maintaining and Updating PDs*.

9. **Maintaining and Updating PDs**

A. Original PDs with the documentation described in Paragraphs 7. *Writing Position Descriptions*, and 8. *Evaluating and Certifying Positions*, will be maintained by the servicing HR office.
(1) Servicing HR offices must establish business practices to ensure that each employee and their immediate supervisor receive a copy of the employee’s official PD and that a copy is filed in the employee’s electronic Official Personnel Folder (eOPF).

(2) Servicing HR offices must maintain the certification of the PD by applying the requirements in the Policy Handbook, Section 2.9 Position Recertification. Documentation of the recertification must include a date and identifier of the certifying official (e.g., signature, electronic signature, initials, email from supervisor’s email address) either on the PD cover page or as an attachment.

(a) If the supervisor cannot certify the PD’s accuracy, refer to Paragraph 9.C.

(b) If the servicing HR office reviews the PD for application of a new OPM classification standard, consistency review, or based on other reviews and determines that the position is misclassified, refer to the Policy Handbook, Section 2.18 Misclassification Due to New Classification Standard or Correction of Classification Error. Also refer to 5 CFR 511 and 5 CFR 536.

B. Supervisors will annually review their employees’ PDs for accuracy in conjunction with preparing EPAPs as described in HRM 07-01. Refer to Policy Handbook, Sections 2.6 Standards of Adequacy and 2.7 Minor Duties for further information on evaluating PD adequacy.

C. At any time the PD is identified as no longer adequate or in need of major revision (e.g., as part of a recertification review or annual EPAP review), the supervisor will contact the servicing HR office to discuss revision of the PD. Servicing HR offices will determine the most effective means of updating PDs with the following options:

(1) Rewriting the PD which is also called a redescription.

(a) PDs will be rewritten when the types of changes or quantity of changes are substantial enough to warrant a redescription.

(i) Merit System Principles must be applied by both the supervisor and servicing HR office. The servicing HR office will consult with the supervisor on the most appropriate approach for addressing PD updates, particularly if there is potential for a change in grade.

(ii) For promotions based on accretion of duties, the requirements and criteria described in the Policy Handbook, Section 2.17 Accretion of Higher-Graded Duties, must be applied.

(iii) For changes to lower grade based on job erosion, refer to the Policy Handbook, Sections 2.19 Reclassification Due to Job Erosion, and 2.20
Use of Reduction in Force (RIF) in Job Erosion. Also refer to 5 CFR 511 and 5 CFR 536 for administering the action.

(iv) For changes to lower grade based on planned management action as described in the Policy Handbook, Section 2.21 Realignment/Reorganization, refer to governing RIF procedures in 5 CFR 351 – Reduction in Force.

(b) A new PD cover page, signed and certified by both the supervisor and the Classifier, must be created and attached to the rewritten PD.

(c) If encumbered by an employee, an appropriate FPPS action to place the employee on the rewritten PD must be effected and copies of the rewritten PD and PD cover page must be provided to the supervisor and employee, and filed in the employee’s eOPF.

(2) The Position Classification Amendment Form, DI-625, will be used to document material changes that do not impact the position classification of the PD as described in the Policy Handbook, Section 2.8 PD Amendments.

(a) The DI-625 must be signed by both the supervisor and the Classifier and attached to the PD, becoming part of the official PD.

(b) Copies of the DI-625 must be provided to the supervisor and employee and filed in the employee’s eOPF as part of the PD.

(c) Use of DI-625 to record position changes is limited to 2 amendments. If more amendments are necessary, the PD must be redescribed.

(d) Collateral Duty Assignments will be documented using the form and process as described in the Policy Handbook, Section 2.14 Collateral Duty Assignments.

(3) Pen and ink changes to the original PD (changes annotated by hand on the original PD cover page/PD) may be made for very minor updates such as terminology and organizational name updates. The Classifier will initial and date next to the pen and ink change(s).

D. Employees may identify potential updates to their own PDs which may include what they believe to be discrepancies or inconsistencies between work described and work performed.

(1) Employees must work with their supervisor to resolve PD updates, discrepancies, and/or inconsistencies.
(a) If the supervisor agrees that changes must be made, the supervisor will contact their servicing HR office who will then advise the supervisor of the best approach for updating the PD as described in Paragraph 9.C.

(b) If the supervisor disagrees that changes must be made, supervisors assign the duties and describe and approve the description of duties, responsibilities, evaluative information, and requirements in the PD, therefore, the PD would remain as described.

(2) If PD discrepancies cannot be resolved with the first level supervisor, employees may contact their second level supervisor for review of the first level supervisor’s decision by providing an explanation of the efforts to resolve PD discrepancies with their first level supervisor and a description of the unresolved discrepancies along with how the employee would like to see them resolved.

(a) The second level supervisor will evaluate the information submitted by the employee, as well as discuss the information with the first level supervisor of the employee and render a decision as to the adequacy of the PD.

(b) If the second level supervisor determines that more information, clarification, and/or observation of work is deemed necessary, they may contact their servicing HR office and request a review of the position, providing all the documentation gathered on the review to this point.

(c) The servicing HR office will review the information provided and determine whether a desk audit is necessary. If a desk audit is determined necessary, the servicing HR office will provide notice to both the employee and their first and second level supervisors and arrange a mutually acceptable time for the audit.

(d) The servicing HR office will provide the results of the desk audit to the second level supervisor for review and position management decision as described in Paragraph 5.C. of this D&S (e.g., redistribution of work within the organization).

(e) The second level supervisor will provide a written response to the employee, with a copy to the servicing HR office and first level supervisor, regarding the results of the overall review of the position.

(f) If the review of the position results in an updated PD and/or a change in the position classification determination of the position, the procedures and requirements outlined in Paragraph 9.C. will be followed.

10. **GS and FWS Employee Position Classification/Job Grading Appeals.**
A. Employees may appeal the pay system, grade, occupational series, and, in some cases, title of their position as described in this D&S, in the Policy Handbook, Section 3 Classification and Job Grading Appeals, and in the Introduction to Position Classification Standards, Appendix 4. Position Classification Appeals.

(1) GS employees may appeal the position classification of their positions based on perceived inaccuracy associated with: occupational series; grade; official position title; and/or for FWS appeals, whether the position is included in or excluded from the GS pay system.

(2) FWS employees may appeal the position classification of their positions based on perceived inaccuracy associated with: occupational series; grade; and/or official position title. FWS employees who believe their job is properly placed in the GS pay system must appeal using the GS rather than the FWS appeal procedures.

(3) Employees may appeal the classification of their PD at any time with the following considerations:

(a) When a position classification action results in an actual loss of grade and/or pay, the employee must appeal the action no later than 15 calendar days after the effective date of the personnel action effecting the position classification action (e.g., downgrade or loss of pay) OR within 15 calendar days after receipt of a classification appeal decision IF the employee wants to preserve the right to retroactive corrective action should the loss of pay and/or grade be overturned as a result of the position classification appeal decision.

(b) There are determinations that may not be appealed by an employee including the accuracy of the official PD; and the series, grade, pay system, or title of a position to which the employee is not officially assigned or to which the employee is detailed or promoted to on a time-limited basis (under 2 years for promotions). Refer to Introduction to the Position Classification Standards, Appendix 4. Position Classification Appeals, Part F. Exceptions (OPM.gov); and 5 CFR section 511.607; and the Policy Handbook Section 3.1 Appellate Process, for a more inclusive list of determinations that may not be appealed.

(c) The Introduction to Position Classification Standards, Appendix 4. Position Classification Appeals, provides GS employees with summary, scope, definitions, authority, responsibilities, exceptions, procedures, where to submit appeals, classification consistency reports, and content of an appeal. The FWS Appropriated Fund Operating Manual, Subchapter S7, Job Grading Appeals, provides FWS employees with coverage, introduction, agency appeal procedures, content of an appeal, time limit for filing an appeal, processing of an appeal by an agency, actions on an appeal to OPM, and effects of an OPM appeal decision. The Policy Handbook, Section 3
Classification and Job Grade Appeals, provides both GS and FWS employees with information on the appellate process, appeal rights, information on designating a representative, appeal procedures, and information on cancellation of an appeal, reconsideration of appeal decisions, and actions.

(4) GS employees may submit position classification appeals to Reclamation, the Department, or directly to OPM as described in the Policy Handbook, Section 3.2 Department Appeals.

(a) If the employee’s PD was validated through the classification validation process conducted by HRPO, the employee will not have the option to appeal to Reclamation; they must appeal to the Department or to OPM.

(5) FWS employees must first submit their job grading appeal to Reclamation or the Department prior to submitting to OPM as described in the Policy Handbook, Section 3.2 Department Appeals.

(a) If the FWS employee is dissatisfied with the employee position classification appeal decision rendered by Reclamation or the Department, the employee has the option to file an employee position classification appeal with OPM within 15 calendar days of the date the employee receives Reclamation’s or the Department’s decision.

(6) Reclamation will follow the same processes and procedures for administering appeals as outlined in the Department’s Policy Handbook, Section 3 Classification and Job Grading Appeals.

(a) Employees who choose to appeal to Reclamation must submit their appeal in writing to Reclamation’s appeals email at appeals@usbr.gov.

(b) Employees must follow the “Department Appeal Procedures” in the Policy Handbook, Section 3.2 Department Appeals, when preparing their appeal package for submission to Reclamation.

(7) Employees who choose to appeal to the Department must submit their appeal in writing as described in the Policy Handbook, Section 3 Classification and Job Grading Appeals.

(a) Employees encumbering SPDs issued by the Department cannot submit employee position classification appeals to Reclamation nor the Department. Employees encumbering these PDs may appeal to OPM.

(8) Employees who choose to appeal to OPM must submit their appeal in writing by following appeal filing instructions found on opm.gov and as further described in
the *Introduction to the Position Classification Standards*, Appendix 4. Position Classification Appeals.

B. The HCO will issue a consistency review as described in Paragraph 12. *Consistency Reviews*, based on the final appeal decision.

11. **Resolution Process for Contested Classification Validation Determinations**

   A. If the servicing HR office’s factor level evaluation(s) are not validated as described in Paragraph 4.B., and informal resolution cannot be reached as described in Paragraph 4.B.(1)(b), the servicing HR office may submit a request for third-party review to the HCO.

       (1) The request must be in writing and contain the PD, evaluation statement, organizational chart, classification validation statement, a statement from the servicing HR office explaining the points of disagreement, and any other supporting documentation that would be useful to the third-party reviewer.

       (2) The servicing HR office must express intent to the HCO to request a third-party review within 15 calendar days of the date of the classification validation statement and work out an agreed upon time frame for submission of the written request with the HCO.

   B. The HCO may arrange for and coordinate a third-party review and will provide final resolution of the disagreements based on the results of the review.

       (1) The cost associated with third party review and resolution of a contested classification validation determination will be paid by the HCO with potential for reimbursement from the office in which the position is located.

   C. The HCO will issue a consistency review as described in Paragraph 12. *Consistency Reviews*, based on the final resolution.

12. **Consistency Reviews**

   A. The HCO will issue consistency review requirements and instructions when there is information indicating inconsistent classification practices which is typically promulgated by position classification appeal decisions, results from third-party reviews and accountability reviews, or when required by the Department or OPM. Additional consistency review policy is addressed in the Policy Handbook, Section 3.2 *Department Appeals*, and is also addressed in the *Introduction to the Position Classification Standards*, Appendix 4. Position Classification Appeals, Part I. Report of Intra-Agency Classification Consistency.

13. **Accountability**
A. Review of the requirements within this D&S will occur during servicing HR office Accountability Reviews; when the HCO issues review requirements and instructions based on information indicating practices inconsistent with the requirements of this D&S; or when there are review and/or analysis requests from the Department. Refer to the Policy Handbook, Sections 2.1 Delegated Classification Authority and 4 Accountability.

14. Record Keeping

A. Records must be managed and maintained by the servicing office in accordance with RM D&S, Information Management (RCD 05-01). Regardless of medium, records may only be disposed of in accordance with approved National Archives and Records Administration (NARA) records retention schedule.

15. Definitions.

A. Accretion of Duties. The non-competitive promotion of an employee whose position has expanded in responsibility over time and is reclassified at a higher grade due to the additional duties and responsibilities.

B. Career Ladder. The range of grades at and below the FPL of the position from and to which the employee may be promoted non-competitively up to the FPL. Career ladder positions are for nonsupervisory permanent appointments.

C. Classification Validation Determination. The results of a review by HRPO of a servicing HR office’s classification evaluation of factor levels 1-8, 1-9 (Knowledge required by the Position); 5-5, 5-6 (Scope and Effect); AND/OR factor level 2-5 (Supervisory Controls) for position classifications below a GS 14 grade level. The review results in HRPO either concurring or not concurring with the evaluation of the servicing HR office.

D. Classifier. Employee with delegated position classification authority and is authorized to certify position classification determinations as delegated.

E. Collateral Duty Assignment. Assignments that are official duties and responsibilities assigned to an employee in addition to and distinct from the primary duties described in the employee’s PD (e.g., Collateral Duty Safety Officer) and are not the primary purpose for establishing the position. Collateral duty assignments do not constitute grade controlling work; are performed less than 25 percent of the time; and are specific to individual employees, as opposed to positions.

F. Consistency Review. A review of the position classification determinations of identical, similar, or related positions by a servicing HR office. A consistency review takes place when a change in position classification results from a Reclamation or Department employee position classification appeal decision, or OPM classification
certificate, or a classification determination resulting from a classification validation third-party review, or if, at any time, the Department or Reclamation uncovers information indicating inconsistent classification practices, or OPM issues new or updated position classification standards or guidance. For this purpose, related positions are those whose position classification is dependent on the classification of the appealed/certified position (e.g., supervisor and leader positions). Similar positions are positions performing the same or similar grade controlling work in similarly structured organizations within the review area.

G. Delegated Position Classification Authority. The authority to certify position classification determinations. This authority is delegated from the Secretary of the Interior to the Bureau of Reclamation (255 DM2.1.E). Classification authority is delegated within Reclamation as described in RM Delegations of Authority 4.I.(1)(d).

H. Desk Audit. Term used to describe additional fact-finding steps taken by the Classifier to obtain, validate, or clarify the information contained in the position description sufficient to make a position classification determination. Desk audits may include telephone or on-site visits with the employee and/or supervisor. Classifiers determine when a desk audit is necessary; however, desk audits are required for accretion of duties actions, when required as part of a complaint process or management directive, and for a classification appeal. Refer to the Policy Handbook, Section 2.16 Desk Audits.

I. Employee. An individual employed by Reclamation, not including contractor personnel and volunteers.

J. Employee Position Classification/Job Grading Appeal. A formal written request submitted by a GS or FWS employee for formal review of their position’s classification (e.g., pay system, occupational series, title, grade) by Reclamation, the Department, and/or OPM.

K. Factor Evaluation System (FES). A format for point factor position classification standards which use nine factors with established point values to determine overall grade. FES is used for most nonsupervisory GS occupations.


M. Federal Activities Inventory Reform (FAIR) Inventory. Required by the Federal Activities Inventory Reform Act of 1998 (P.L. 105-270) and OMB Circular A-76 – Competitive Sourcing. For purposes of this D&S definition, the inventory represents the number of positions, both encumbered and vacant, by organization code.
N. Federal Personnel and Payroll System (FPPS). The Department of the Interior’s integrated, on-line, and real-time automated personnel and payroll system.

O. Federal Wage System (FWS). A uniform pay-setting system that covers Federal appropriated and non-appropriated fund employees who are paid by the hour and perform work in trade, craft, and laboring positions. The system ensures pay will be the same as the pay of other similar Federal jobs in the same wage area and will be in line with the pay of similar private sector jobs in the same wage area. For purposes of this D&S, FWS includes employees in the Wage Grade (WG), Wage Leader (WL), and Wage Supervisor (WS) pay plans.

P. Full Performance Level (FPL). The position classification determination of grade that represents the highest grade that can be obtained in a position without further competition.

Q. Functional Statement. Description of the mission, purpose, and official roles and responsibilities of an organizational component.

R. General Schedule (GS). A classification pay system that covers the majority of civilian Federal employees performing professional, technical, administrative, and clerical work. The GS includes positions with a range of difficulty, responsibility, and qualifications from grades GS-01 through GS-15; and includes both nonsupervisory and supervisory positions.

S. Major Duties. Duties that represent the primary reason for the position’s existence, and which govern the qualification requirements and typically occupy most of the employee’s time on a regular and recurring basis, which means they are performed in a continuous, uninterrupted manner, or they are performed at recurring intervals with anticipated frequency.

T. Narrative Standard. A classification standard describing the nature of work and level of responsibility for each grade covered by the standard. This requires the Classifier to look at the work as a whole and select the most appropriate overall grade.

U. Office of Personnel Management (OPM). Established in 1978 when the Civil Service Commission (established in 1883 as part of the Civil Service Act) was reorganized into three new organizations: the OPM, the Merit Systems Protection Board, and the Federal Labor Relations Authority. The OPM is responsible for personnel management of the civil service of the Federal Government.

V. Pathways Programs. Government-wide programs established or enhanced by Executive Order 13562, “Recruiting and Hiring Students and Recent Graduates.” The programs are Internship Program, Recent Graduates Program, and Presidential Management Fellows Program. The Pathways Programs were designed to provide agencies with streamlined processes to recruit and hire students and recent graduates.
and to provide meaningful training, mentoring, and career-development opportunities to candidates.

W. Pay Plan. Identifies the pay system under which the position is covered and is represented by a two-letter alphabetical code (e.g., GS for General Schedule, WG for Wage Grade which is under the FWS).

X. Position Classification. A process through which Federal jobs are assigned to a pay system and pay plan, occupational series, official title, and grade or band, based on consistent application of position classification standards developed by OPM.

Y. Position Classification Appeal Decision. A written document issued as the final administrative decision on the position classification determination for the appealed position. A final decision issued by OPM is called a classification certificate.

Z. Position Classification Determination. The decision classifying a position to a pay plan, occupational series, title, and grade in accordance with approved position classification standards.

AA. Position Classification Standard. Issued by OPM to relate the grade level definitions in Title 5 U.S.C. to specific work situations and thereby provide the basis for assigning each position the appropriate title, series, and grade.

BB. Position Description (PD). The official statement and description of management’s assignment of major duties and responsibilities and of the position’s organizational and supervisory relationships. The PD also describes the primary purpose, scope, complexity and nature of work assignments, as well as other evaluative factors such as knowledge, skills, and abilities and judgment used.

CC. Position Description Cover Page (PD cover page): The cover page attached to a PD which is used to document position requirements and determinations, as well as organizational location of the position. The PD cover page is also used to document certification by the supervisor as to the accuracy of the PD, organizational context, and authorized establishment of the position, as well as certification by the agency official with delegated position classification authority as to the position classification determination of the position.

DD. Position Management. The process by which positions and organizational structures are carefully designed to align skills and assignments of employees with the goals and objectives of successfully carrying out the organization’s mission and program, balancing the efficient and effective use of economic and human resources.

EE. Realignment. The movement of an employee and the employee’s position (e.g., organization change such as reorganization or transfer of function) when the employee
stays in the same agency and there is no change in the employee’s position, grade, and pay.

FF. Reorganization. The planned elimination, addition, or redistribution of functions or duties in an organization.

GG. Standard Position Description (SPD). A PD that has been classified and formally established for use throughout a designated organization (e.g., region, Reclamation, Department) for positions throughout the organization whose primary purpose, major duties and responsibilities, as well as nature of work, and other evaluative factors, are substantially the same.

HH. Third-Party Review. A neutral person, group, or organization (e.g., a contract classifier, committee of Reclamation servicing HR specialists, or Department) chosen by the HCO to review written submissions from servicing HR offices who disagree with a classification validation determination of HRPO. The review may include the pay plan, occupational series, title, and/or grade of the position being reviewed, in addition to the factor levels evaluated as part of the classification validation process.

16. Review Period. The originating office will review this release every 4 years.
Appendix A. Calculating Highest Qualifying Level of Work Directed – Base Level

General Schedule Supervisory Guide (GSSG), Factor 5 – Difficulty of Typical Work Directed: this factor measures the difficulty and complexity of the basic work most typical of the organization(s) directed.

<table>
<thead>
<tr>
<th>Steps</th>
<th>Standard and Guidance</th>
<th>Application</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Ensure Proper GSSG Coverage</td>
<td>To be covered by the GSSG, the position must perform supervisory work and related managerial responsibilities that:</td>
<td>Create an organization roster using the Base Level Roster (BLR) that lists all positions supervised by the supervisory position. Vacant positions should be included on the chart only if they are classified and funded and are being recruited for, or there is intent to recruit in the immediate future. Use column L to track number of employees by full time equivalent (FTE); annotate accurate FTE which may or may not be a whole number (e.g., for a position that is I.A. with 3 full time and 1 half time employee, the FTE would be 3.5 for that position).</td>
</tr>
</tbody>
</table>

a. “Require accomplishment of work through combined technical and administrative direction of others.” This means supervision of people, not programs or projects. The supervision of people must meet at least Factor Level 3-2 in the GSSG to be credited for coverage under the GSSG. If there is a paramount requirement of knowledge or experience in trades and crafts, use FWS Job Grading Standard for Supervisors – not the GSSG. Positions |

Identify and annotate the positions on the BLR that do not meet this requirement (1.a.).
<table>
<thead>
<tr>
<th>Steps</th>
<th>Standard and Guidance</th>
<th>Application</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>that ONLY supervise private sector contractors are NOT covered by the GSSG. For further guidance/reference OPM appeal decisions (C-) or digests (No.): C-1801-11-05 (counting vacant positions and addressing weak ratio); No. 15-05 (Non-professional supervising professional); No. 32-04 and 32-05 (crediting volunteer and contractor work)</td>
<td></td>
</tr>
<tr>
<td>b.</td>
<td>“Constitute a major duty occupying at least 25 percent of the position’s time.” It is generally considered poor position management to design a supervisor position that supervises the minimum amount of time (25%). Furthermore, the DOI Policy Handbook (Section 1.6) requires sound position management when establishing supervisor to employee ratios and requires a minimum of 1:4 (absolute) and 1:10 (where feasible/first level supervisor) for GS; and 1:15 (where feasible/first level supervisor) for FWS. Furthermore, when factoring nonpermanent work (term or temporary) into the percentage for coverage, this work must be considered in the base level evaluation (No. 28-07). For further guidance/reference: No. 20-05 and No. 28-06 (organization must be so large and so complex as to require subordinate supervisors); C-1102-14-02 and No. 20-01 (artificially high percentages of time stated for supervision)</td>
<td>How much of the position’s time (percentage) is spent performing the requirement above (1.a)? Annotate percentage on Base Level Spreadsheet (BLS) F27 and the BLR B2.</td>
</tr>
<tr>
<td></td>
<td>What is the supervisory ratio?</td>
<td>Direct: Annotate on BLS B29/BLR C2</td>
</tr>
<tr>
<td>Steps</td>
<td>Standard and Guidance</td>
<td>Application</td>
</tr>
<tr>
<td>-------</td>
<td>------------------------</td>
<td>-------------</td>
</tr>
<tr>
<td>2. Determining positions for base level calculation</td>
<td>Highest grade of basic, mission-oriented, nonsupervisory work performed that constitutes 25 percent or more of the workload of the organization. Exclude the following from the workload calculation:</td>
<td>Ensure the BLR from Step 1 lists the full performance level (FPL) grades of the positions. Use FPL when calculating base level.</td>
</tr>
<tr>
<td></td>
<td>a. “The work of lower level positions that primarily support or facilitate the basic work of the unit.” For further guidance/reference: C-0301-13-03 (walk through of exclusions)</td>
<td>Determine the workload to be excluded due to 2.a. Annotate this adjustment on the BLR. Provide clarifying explanation if necessary.</td>
</tr>
<tr>
<td></td>
<td>b. “Any subordinate work that is graded based on criteria in the GSSG or the Work Leader Grade-Evaluation Guide.” The nonsupervisory/lead work of supervisory or lead positions can be credited at the appropriate grade level(s) of the work. For further guidance/reference: C-2210-13-03 (crediting technical work and excluding Lead work)</td>
<td>Determine the percentage and grade level(s) of the remaining workload. Annotate this adjustment on the BLR. Provide clarifying explanation if necessary.</td>
</tr>
<tr>
<td></td>
<td>c. “Work that is graded based on an extraordinary degree of independence from supervision, or personal research accomplishments, or adjust the grades of such work (for purposes of applying this guide) to those appropriate for performance under “normal” supervision.” No. 10-03 (“Thus, where Factor Level 2-5 (nonsupervisory FES) is the grade-determining factor for a position, that position would not normally be creditable toward determining the base level of work supervised.”) Digest No.</td>
<td>Determine the workload to be excluded due to 2.c. Determine any other adjustments and provide clarifying explanation if necessary. Annotate this adjustment on the BLR.</td>
</tr>
<tr>
<td>Steps</td>
<td>Standard and Guidance</td>
<td>Application</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>21 page 4 (“GS-14 positions could not be used for base level purposes.” “It (GSSG) does, however, permit adjusting the grades of such work for purposes of applying the guide to those appropriate for performance under ‘normal’ supervision.”) (In addition, notes from OPM training indicate that you may figure the grade based on normal supervision and credit appropriate workload at this grade.)</td>
<td></td>
<td>This should have been addressed under Step 1.a.</td>
</tr>
<tr>
<td></td>
<td>d. “Work for which the supervisor or a subordinate does not have the responsibilities defined under Factor 3.”</td>
<td></td>
</tr>
<tr>
<td>3. Ensure General Schedule grade equivalent for remaining Non-GS positions</td>
<td>Using GS Classification standards, determine GS equivalent for all positions that can be credited for base level (i.e., have not been eliminated in Steps 1 and 2). No. 20-06 (credited WG-10 Electrician work as similar to GS-07 Technician work); No. 31.09 (contractor equivalent). Reclamation guidance from August 1993 gave general guidance as follows: Unskilled WG such as Laborers could be GS-1/2; Semi-skilled such as warehouse could be GS-3/4 and routine maintenance or utility worker could be GS-5/6; Vehicle operation such as motor vehicle and forklift operators could be GS-5/6; medium vehicles such as tractors could be GS-7/8; and heavy equipment such as crane or drill rig could be GS-9/10; Skilled wage positions such as trades helpers could be GS-5/6; intermediate trades workers could be GS-7/8; journey level such as electricians and plant mechanics could be GS-9/10; and expert level such as control center operators and</td>
<td>Determine GS equivalent for positions. Annotate on the BLR. Once this is done, complete columns K and L on the BLR.</td>
</tr>
</tbody>
</table>
## Steps

<table>
<thead>
<tr>
<th>Standard and Guidance</th>
<th>Application</th>
</tr>
</thead>
<tbody>
<tr>
<td>communications and instrumentation could be GS-11 (based on recent OPM digest, this equivalent would require extensive justification No. 32-01); special skills like model makers could possibly be GS-12 (based on OPM appeals, would not likely have WG at this level).</td>
<td></td>
</tr>
</tbody>
</table>

### 4. Calculating Base Level

<table>
<thead>
<tr>
<th>Method 1. For smaller organizations, determine grade levels and associated percentages specific to each position supervised based on individual analysis of each position.</th>
<th>Using columns K and L on the BLR, enter the FTE numbers by grade on the BLS (Row 25). For Method 1, adjust grade distribution for each position based on position analysis/evaluation.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Method 2. For larger organizations, enter a prescribed distribution of grade levels and associated percentages for all positions supervised. The prescribed distribution is 10/50/40. In other words, 10 percent above grade, 50 percent at grade, and 40 percent below grade.</td>
<td>Using columns K and L on the BLR, enter the FTE numbers by grade on the BLS (Row 25). For Method 2, the prescribed distribution has been pre-populated on the BLS.</td>
</tr>
<tr>
<td>Method 3. For second level supervisors who supervise more than 50 percent of the time and spend at least 50 percent of the total position time supervising a specific portion of the organization. In this case, the base level of that specific portion, can be used as the base level. It should be noted...OPM has asserted during training that most all base levels will be derived using Method 1 or 2. OPM appeal decisions support this assertion. The rationale is that the supervisor must spend 50 percent of the work time supervising a portion of the organization which, on appeal, is</td>
<td>If using Method 3 you will use Method 1 for the data entry. Document the portion of the organization that requires supervision taking at least 50 percent of the supervisor’s time and upon which the base level will be evaluated. Provide justification and explanation for using Method 3. Provide explanation on BLS I32.</td>
</tr>
</tbody>
</table>
Reclamation Manual
Policy/Directives and Standards

<table>
<thead>
<tr>
<th>Steps</th>
<th>Standard and Guidance</th>
<th>Application</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>generally asserted by the appellant to be the higher graded work. OPM questions, on appeal, the veracity of spending so much time supervising higher graded employees who should be working relatively independently. Furthermore, if there are subordinate supervisors over that “portion” of the work, the veracity of the claim is questioned even further. For further guidance/reference: Digest No. 22 (Page 1-2 gives an excellent explanation of when you can and cannot use Method 3); No. 20-06; No. 19-06; No. 32-01.</td>
<td></td>
</tr>
</tbody>
</table>

5. **Base Level Determination**
The highest grade which best characterizes the nature of the basic, mission-oriented, nonsupervisory work performed or overseen by the organization directed; and constitutes 25 percent or more of the workload (not positions or employees) of the organization.

Once data is entered in the BLS from Step 4 using BLR data from Steps 1-3, the base level is the grade where the cumulative total (moving from GS-15 down) reaches at least 25 percent (column T on the BLS). Use the BLS to calculate and document this analysis.

### Base Level Roster (BLR)

<table>
<thead>
<tr>
<th>% Time</th>
<th>Direct</th>
<th>Indirect</th>
<th>Sub</th>
<th>Supervisor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Step 1.b. What percentage of time is spent performing the requirements of 1.a? What are the ratios?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Position</th>
<th>FTE</th>
<th>Series</th>
<th>Grade</th>
<th>Pay Plan</th>
<th>PD Number</th>
<th>% Time</th>
<th>Direct Ratio</th>
<th>Indirect Ratio</th>
<th>Sub Ratio</th>
<th>Supervisor Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Step 1 - List all positions supervised by Title</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Position</th>
<th>FTE</th>
<th>Series</th>
<th>Grade</th>
<th>Pay Plan</th>
<th>PD Number</th>
<th>% Time</th>
<th>Direct Ratio</th>
<th>Indirect Ratio</th>
<th>Sub Ratio</th>
<th>Supervisor Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Step 2.a. Star positions to be excluded. Explain.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Position</th>
<th>FTE</th>
<th>Series</th>
<th>Grade</th>
<th>Pay Plan</th>
<th>PD Number</th>
<th>% Time</th>
<th>Direct Ratio</th>
<th>Indirect Ratio</th>
<th>Sub Ratio</th>
<th>Supervisor Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Step 2.b. - Annotate adjustments</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Position</th>
<th>FTE</th>
<th>Series</th>
<th>Grade</th>
<th>Pay Plan</th>
<th>PD Number</th>
<th>% Time</th>
<th>Direct Ratio</th>
<th>Indirect Ratio</th>
<th>Sub Ratio</th>
<th>Supervisor Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Step 2.c. - Annotate adjustments</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Position</th>
<th>FTE</th>
<th>Series</th>
<th>Grade</th>
<th>Pay Plan</th>
<th>PD Number</th>
<th>% Time</th>
<th>Direct Ratio</th>
<th>Indirect Ratio</th>
<th>Sub Ratio</th>
<th>Supervisor Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Step 3 - Annotate equivalent</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Position</th>
<th>FTE</th>
<th>Series</th>
<th>Grade</th>
<th>Pay Plan</th>
<th>PD Number</th>
<th>% Time</th>
<th>Direct Ratio</th>
<th>Indirect Ratio</th>
<th>Sub Ratio</th>
<th>Supervisor Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Final Base Level Roster - series and grade.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Position</th>
<th>FTE</th>
<th>Series</th>
<th>Grade</th>
<th>Pay Plan</th>
<th>PD Number</th>
<th>% Time</th>
<th>Direct Ratio</th>
<th>Indirect Ratio</th>
<th>Sub Ratio</th>
<th>Supervisor Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Employees (FTE)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### mm/dd/yyyy
NEW RELEASE or TEMPORARY RELEASE or SUPERSEDES...
(Minor revisions approved mm/dd/yyyy)
### Base Level Spreadsheet (BLS) - Worksheet for calculating highest qualifying level of basic nonsupervisory work directed (base level).

**Position Number:**

**Organization Code:**

**Org Title of Position:**

<table>
<thead>
<tr>
<th>Position Classification</th>
<th>Organization Name</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>GRADE</th>
<th>GS-15</th>
<th>GS-14</th>
<th>GS-13</th>
<th>GS-12</th>
<th>GS-11</th>
<th>GS-10</th>
<th>GS-09</th>
<th>GS-08</th>
<th>GS-07</th>
<th>GS-06</th>
<th>GS-05</th>
<th>GS-04</th>
<th>GS-03</th>
<th>GS-02</th>
<th>GS-01</th>
<th>TOTALS FACTOR</th>
<th>TOTALS PERCENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>GS-15</td>
<td>60.0%</td>
<td>10.0%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>GS-15</td>
</tr>
<tr>
<td>GS-14</td>
<td>40.0%</td>
<td>50.0%</td>
<td>10.0%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>GS-14</td>
</tr>
<tr>
<td>GS-13</td>
<td>40.0%</td>
<td>50.0%</td>
<td>10.0%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>GS-13</td>
</tr>
<tr>
<td>GS-12</td>
<td>40.0%</td>
<td>50.0%</td>
<td>10.0%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>GS-12</td>
</tr>
<tr>
<td>GS-11</td>
<td>40.0%</td>
<td>50.0%</td>
<td>10.0%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>GS-11</td>
</tr>
<tr>
<td>GS-10</td>
<td>40.0%</td>
<td>50.0%</td>
<td>10.0%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>GS-10</td>
</tr>
<tr>
<td>GS-09</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>GS-09</td>
</tr>
<tr>
<td>GS-08</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>GS-08</td>
</tr>
<tr>
<td>GS-07</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>GS-07</td>
</tr>
<tr>
<td>GS-06</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>GS-06</td>
</tr>
<tr>
<td>GS-05</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>GS-05</td>
</tr>
<tr>
<td>GS-04</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>GS-04</td>
</tr>
<tr>
<td>GS-03</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>GS-03</td>
</tr>
<tr>
<td>GS-02</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>GS-02</td>
</tr>
<tr>
<td>GS-01</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>GS-01</td>
</tr>
</tbody>
</table>

**Number of Employees (FTE):**

0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000

**Percentage of Time Spent supervising:**

0%

**Supervisory Ratios**

**Direct:**

**Indirect:**

**Method Used to Calculate Base Level and Explanation if necessary:**