

Evaluation Statement

Proposed Classification: Wildlife Inspector, GS-1813-11

Location: U.S. Fish and Wildlife Service
Office of Law Enforcement

Reference: Job Family Standard, Administrative Work in the Inspection, Investigation, Enforcement, and Compliance Group, 1800, dated March 2009

Background: The Office of Law Enforcement's (OLE's) mission is to protect wildlife resources by investigating wildlife crimes, regulating wildlife trade, and helping others understand and comply with protection laws. OLE works in partnership with Federal, international, State, tribal, and local counterparts. Currently, a variety of new challenges and trends complicate this work. Population pressures, more accessible international travel and trade, frequent work with individuals with languages other than English, the proliferation of organized crime activity, and the threat of invasive species all impact the nature of the work and the skills required.

Work requires skill in using advanced technology, analytical skill to evaluate and interpret data, including human intelligence, and the ability to make risk assessments in order to focus inspections and investigations. OLE must expand partnerships, as well as increase the use of multi-agency and multi-function teams to accomplish high-risk, high-impact investigations.

Inspectors must increase the use of special support service such as forensics and the use of information technology and expand partnerships with industry to encourage compliance and with other federal agencies to target and detect organization or individuals potentially involved in criminal activity.

The incumbent serves as a full-performance level inspector responsible for ensuring that laws and regulations regarding the import and export of fish and wildlife are met. The incumbent performs the full range of inspection, identification, and compliance duties, using a variety of automated systems, motor vehicles, and other equipment. There is increased focus on education and outreach activities to ensure compliance and on the identification of high-risk transactions and more complex and diverse inspections.

Series determination: The purpose of the work is to ensure compliance with regulations and laws governing wildlife trade and to inform the public of protection laws with a view toward reducing violations of laws and crimes. This series covers positions which supervise, lead, or perform inspection, investigation, enforcement, or compliance work. This series is applicable when the work of the position is covered by two or more administrative occupations in the 1800 group and no one occupation is predominate; or is consistent with the occupational group but not covered by an established series in the 1800 group. Positions in the 1801 series require, as does the subject position, knowledge of U.S. laws and regulation, international laws and regulations governing fish and wildlife importation and exportation and knowledge of the principles and practices of compliance inspection procedures to monitor wildlife shipments in order to ensure compliance with U.S. and foreign wildlife protection laws. Therefore, the appropriate series for this position is 1801.

Title determination: Titles for positions assigned to the 1801 series may be constructed to reflect the specific purpose and knowledge requirements for the work. Therefore, the appropriate title for this position is Wildlife Inspector.

Grade determination: The Administrative Work in the Inspection, Investigation, Enforcement, and Compliance Group, 1800, contains grade-level criteria for evaluating positions in the GS-1801 series. The Standard is written in the Factor Evaluation System (FES) format. Under the FES, positions are placed in grades on the basis of their duties, responsibilities, and the qualifications required as evaluated in terms of nine factors common to nonsupervisory positions in General Schedule (GS) occupations.

Factor 1, Knowledge Required by the Position

This factor measures the nature and extent of information or facts that an employee must understand to do acceptable work (e.g., steps, procedures, practices, rules, policies, theories, principles, and concepts) and the nature and extent of the skills necessary to apply that knowledge.

At Level 1-7, investigators must have knowledge of, and skill in applying, a wide range of complex investigative, inspection, compliance, and/or protection principles, concepts, and practices; criminal and case law precedents; administrative and legal procedures; legal jurisdictions; a broad range of advanced investigative techniques, research methodologies, and statistical and financial analyses; and business practices common to regulated entities and parties.

Knowledge of, and skill in applying, comprehensive international and Federal wildlife laws and implementing regulations relating to import, export, and interstate commerce in wildlife and wildlife products and the humane transport of wildlife sufficient to:

- examine and identify genus, species, and subspecies of live wildlife and/or wildlife parts and products to maintain compliance with Federal and foreign wildlife laws;
- serve as a technical expert to assist in criminal investigations;
- ensure the proper handling of hazardous wildlife or wildlife products, such as venomous reptiles, dangerous primates, or trophy shipments, to prevent disease or injury;
- determine whether transport of live wildlife complies with Federal humane shipping and transport regulations and whether live animals require immediate veterinary care on arrival due to inadequate shipping practices;
- coordinate the housing and transportation of live wildlife seizures for the port of entry, authorize veterinary care, verify inventories, certify destruction of dead animals, and assist in the final disposition of property;
- provide information on laws and regulations covering a variety of wildlife concerns, including import/export activities, permits, bans on migratory birds, endangered animals, unprotected or State regulated wildlife, injurious wildlife, and antique articles made from prohibited wildlife parts (e.g., carved ivory);
- review proposed regulations affecting various aspects of wildlife trade;
- participate in meetings representing the agency with personnel from other Federal and State agencies, zoo representatives, importers/exporters, customhouse brokers, permittees, and the public;
- design and structure presentations for a wide range of audiences, such as customhouse brokers' meetings, wildlife seminars, symposia, and school programs; and

- conduct training for local jurisdictions and foreign counterparts on wildlife identification, inspection techniques, document review, identification of fraudulent documents, and smuggling.

This is identical to the knowledge required in the subject position. his position independently plans, coordinates and carries out the full range of inspection and compliance activities particularly for diverse and moderately complex transactions, special and unique conditions, and where there is a high risk of smuggling, fraud, and hostile incidents; and serves an authority concerning compliance of importation and exportation of wildlife with appropriate Federal, State, and local environmental laws/regulations. This position also, develops procedures and guidelines, and advises other inspectors, other Federal agencies, travelers, and business representatives of procedures and requirements and resolves problems. In addition, this position requires knowledge of laws and regulations governing fish and wildlife importation and exportation; procedures, methods and techniques of investigations in order to identify information needed; and knowledge of the principles and practices of compliance inspection procedures to monitor wildlife shipments. This position also requires knowledge of pertinent U.S. laws and regulation, international laws and regulations and inspection operations.

The knowledge required in this position is greater than that required at Level 1-6 where investigations are typically less complex, e.g., there is no need to coordinate investigative activities with other jurisdictions, and there is no need to develop new approaches, methods, or procedures since investigations are typically well-precedented.

The knowledge requirements of the position do not meet the criteria for Level 1-8 where the investigator typically develops agency-wide policies, procedure, and strategies or provides expert technical advice, guidance, and recommendations to agency management and other senior agents, officers, or inspectors on critical operations.

Factor 2, Supervisory Controls

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

At Level 2-3, the employee independently plans investigations including the approach to take, issues to review, and questions to ask. Solutions for unusually difficult or sensitive situations are developed jointly with the supervisor. Supervisory review focuses on the soundness of results rather than the application of work methods and techniques. Work products are reviewed to ensure appropriate factors have been considered, sufficient evidence has been gathered to support conclusions, and pertinent regulations and precedents have been applied.

At Level 2-4, the employee carries out assignments that typically include resolution of difficult or sensitive situations. This includes deciding whether to limit the investigation or expand it to other entities. Where assignments require additional resources, the employee is responsible for independently planning, organizing, and coordinating the work of team members.

This position does not meet Level 2-4. Even this position would require the incumbent to works independently and the supervisor review focuses on the soundness of results rather than the application of work methods and techniques, this position does not independently plan, organize, and coordinate the work of team members, therefore meeting Level 2-3.

Factor 3, Guidelines

This factor covers the nature of guidelines and the judgment employees need to apply them. At Level 3-3, the employee uses a variety of guidelines, manuals, and standard reference materials; however, they are not completely applicable to the work or have gaps in specificity. The investigator uses judgment in interpreting, adapting, applying, and deviating from guidelines based on unusual circumstances. The incumbent analyzes the results of such adaptations and recommends changes in established methods and procedures.

This is a direct match to the use of guidelines in this position. Guidelines for this position consist of a range of U.S. and international laws, regulations, and treaties that protect wildlife and limit commercial traffic in endangered animals and plants. The assignments for this position are not straightforward and unique or complex problems encountered are not resolved with standard approaches. The incumbent must use judgment to interpret and adapt the guidelines for application to specific investigations. This position is responsible for performing studies and analysis concerning compliance issues relating to importation and exportation of wildlife with appropriate Federal, State, and local environmental laws/regulations. Participates, as required, with law enforcement agents, in civil and criminal investigations to determine if those suspected of illegal wildlife trade and other violations are in compliance with appropriate Federal, State, and local environmental laws and regulations. Adapts work procedures to specific set of facts or circumstances in investigations or analyze trends to participate in the development of new or modified program guidelines, therefore meeting Level 3-3.

The use of guidelines exceeds Level 3-2 where the guidelines are directly applicable to the assignment. The use of guidelines does not meet the criteria for Level 3-4 where guidelines for conducting new or innovative investigations are scarce or of limited use.

Factor 4, Complexity

This factor covers the nature, number, variety, and intricacy of tasks, steps, processes, or methods in the work performed; the difficulty in identifying what needs to be done; and the difficulty and originality involved in performing the work.

At Level 4-4 the work consists of developing, planning, and conducting investigations using a range of techniques such as physical surveillance; electronic surveillance; electronic or oral intercepts; undercover operations and purchases; and evaluating and disseminating intelligence gained during searches, seizures, interrogations, and arrests.

This position works closely with law enforcement agents and counterparts from Customs and Border Protection and other Federal agencies that police internal trade. WIs enforce a range of U.S. and internal laws, regulations, and treaties that protect wildlife and limit commercial traffic of endangered animals and plants. WIs clear legal imports and exports, and stop shipments that violate the law, in which they must be able to identify thousands of different species, both live and as parts and products; and monitor international passenger traffic. When a WI has reasonable grounds to suspect that a criminal offense has been committed, the WI may detain the suspect and seize evidence that may, possibly, be used in a criminal proceeding. WIs look at all of the wildlife trade to make sure importers comply with the frequently changing laws, which is essential to the Service's efforts to enforce wildlife protection laws, intercept unlawful traffic, and fulfill the Nation's commitment to global wildlife conservation, therefore meeting Level 4-4.

This is a direct match to the complexity of investigations in the subject position, which are characterized by all of the above factors. The complexity of this position exceeds Level 4-3

where the cases are less complex and the investigator need only apply a variety standard techniques and procedures. This position does not meet the criteria for Level 4-5 where cases are characterized by such things as the existence of few or no precedents to follow; significant unresolved legal or regulatory issues; intense and widespread public, media, or congressional interest; and emerging and innovative methods and patterns of criminal activity.

Factor 5, Scope and Effect

This factor covers the relationships between the nature of work, i.e., the purpose, breadth, and depth of the assignment and the effect of work product or services within and outside the organization. Effect measures such things as whether the work output facilitates the work of others or provides timely services of a personal nature.

At Level 5-3, work involves the treatment of a variety of conventional problems and issues for which there are known and accepted solutions contained in a wide range of established compliance regulations, practices, and procedures. Activities include interviewing the subject, analyzing pertinent court or prison records, reviewing laws and regulations to identify specific provisions that apply, and presenting findings to obtain compliance. The impact of the employee's independent decisions is usually on an individual subject or a small number of individuals.

Level 5-4, work involves investigations where conclusive findings or evidence are difficult to develop because of unusual conditions such as especially large and complex sets of interrelated data, the concealment of facts by highly sophisticated schemes, or issues with significant regional impact.

This position exceeds Level 5-3. Wildlife inspectors, for this position, makes sure that wildlife shipments entering the United States meet the requirements of U.S. laws, such as the Endangered Species Act, as well as the laws of foreign countries that have established special protections for their native animals. They work closely with their counterparts from the U.S. Customs Service, U.S. Department of Agriculture, Immigration and Naturalization Service, and Public Health Service to maintain import/export controls and interdict smuggled wildlife and wildlife products. The Service's wildlife inspection program is the major mechanism for U.S. enforcement of the (CITES), which is a global agreement through which several countries regulate commercial traffic of hundreds of protected animals and plants. The WIs are stationed at the Nation's major international airports, ports, and border crossings. WIs looks at all of the wildlife trade to make sure importers comply with the frequently changing laws. Their work is essential to the Service's efforts to enforce wildlife protection laws, intercept unlawful traffic, and fulfill the Nation's commitment to global wildlife conservation. The work of this position does not deal with straightforward issues of compliance where evidence may be easily accessed or, in more difficult situations, obtained with reasonable diligence. The work not involves uncovering suspected conspiracies and attempted violations of law before they actually occur, therefore meeting Level 5-4.

Factors 6 and 7, Personal Contacts and Purpose of Contacts

These factors include face-to-face and remote dialogue with persons not in the supervisory chain. The levels of these factors consider what is necessary to make the initial contact, the difficulty of communicating with those contacted, the setting in which the contact take place, and the nature of the discourse.

At Level 6-3, contacts are with individuals or groups from outside the agency in moderately unstructured settings, on a nonroutine basis. The extent of each contact is different. Typical contact at this level is with investigators from other agencies, district attorneys, witnesses, informants, and complainants.

This is comparable to the nature of contacts in this position. Contacts are with criminal investigators and other Service personnel, federal, State and international officials, Native American tribes, Departments of Interior and Justice Attorneys, private industry and the general public.

The nature of contacts exceeds Level 6-2 where contacts are usually made at the employee's work place. The nature of contacts does not meet the criteria for Level 3-4 where typical contacts are with Members of Congress, leading representatives of foreign governments, presidents of large national or international firms and organizations, State governors, or mayors of large cities.

The purpose of personal contacts ranges from factual exchanges of information to situations involving significant or controversial issues and differing viewpoints, goals, or objectives.

The purpose of this position's contacts compares to Level "c" which describes the purpose as to persuade individuals or groups who are fearful, skeptical, uncooperative, threatening, or potentially dangerous to provide information, accept findings, or take corrective action required by law. Level "d" does not match the purpose of contacts for this position, but rather describes a purpose to negotiate and resolve major, highly controversial issues or to justify and defend decisions on such issues. Positions taken by the employee on behalf of the agency are strongly contested, typically by a team of attorneys, accountants, or representative of major interest groups.

Meets Level 7c. The purpose of contacts is to inform, educate, and ensure the compliance of private industry and public with laws, regulations, policies, and procedures regarding the transport of wildlife; and to gather and exchange data and information, to persuade or influence others to adapt desired courses of action, or to exercise various regulatory controls and authorities. In addition, the purpose of contacts, include providing testimony in legal proceedings and providing presentations and reports.

The purpose of contacts exceeds Level b where contacts are with individuals or groups who are working toward mutual goals and have basically cooperative attitudes. The nature of contacts in this position does not meet the criteria for Level d where contacts usually involve active participation in conferences, meeting, hearing, or presentations about problems or issues of considerable consequence or importance.

Factor 8, Physical Demands

This factor covers the requirements and physical demands placed on the employee by the work assignment. At Level 8-2, the work involves long periods of standing and recurring stooping and bending. The work can require frequent and recurring surveillance in which there is considerable amount of walking, stooping, bending, and climbing. The employee may be required to remain in one location for many hours without relief. The work may also include frequent lifting of moderately heavy objects such as luggage or boxes in cargo containers.

This is identical to the physical demands of the subject position. WI's, assigned to this position, are not only subject to possible bites and scratches from animals, but also to potentially lethal envenomation by snakes, lizards, scorpions, etc. Inspectors may also be subject to exposure to disease (bioaerosols and blood borne pathogens) carried by primates and birds, such as hepatitis B, herpes B, and psittacosis, histoplasmosis, or ebola virus. Inspectors may be exposed to hazardous chemicals, some of which are carcinogenic or known to cause liver and kidney damage or affect the nervous system. These chemicals are used as pesticides and/or preservatives on hunting trophies and fur skins. They may be subject to exposure to various communicable disease (i.e., tuberculosis) while conducting inspections or interviewing arriving international passengers.

The physical demands of the position exceed Level 8-1 where the work is mainly sedentary. The criteria for Level 8-3 are not met. At that level, employees must be prepared to protect themselves or others from physical attacks at any time without warning.

Factor 9, Work Environment

This factor considers the discomfort and risk of danger in the employee's physical surroundings and the safety precautions required. At Level 9-2, the work involves moderate risks and requires special safety precautions or protective clothing or gear. The work at this level involves exposure to moderate discomfort, high noise levels, dust, auto and aircraft exhaust adverse weather or areas with high crime rates.

Work is accomplished in both office and outdoor settings. There is regular and recurring exposure to moderate risks and discomforts such as adverse weather conditions and dusty or noisy environments. This position requires the WI to conduct physical inspection of shipments at carrier warehouses, container stations, passenger terminals, quarantine stations, and other facilities which are dispersed throughout the port of entry and may be many miles apart. Surveillance work may include use of aircraft, boats and motorized vehicles. Incumbent is expected to reduce risk to self and other workers on assignment.

The physical demands of the position exceed Level 9-1 where the work is usually in an office setting. The work environment of the position does not meet the criteria for Level 9-3 where the work may involve such things as involvement in physical altercations or the use of lethal weapons while attempting to arrest suspects.

Summary:

Factor	Level	Points
1. Knowledge Required by the Position	1-7	1250
2. Supervisory Controls	2-3	275
3. Guidelines	3-3	275
4. Complexity	4-4	225
5. Scope and Effect	5-4	225
6/7. Personal Contacts and Purpose of Contacts	6/7-3c	180
8. Physical Demands	8-2	20
9. Work Environment	9-2	20
Total		2470

The total points awarded are 2470, which falls within the range for GS-11 (2355-2750).

Conclusion: The appropriate classification for this position is Wildlife Inspector, GS-1801-11.

See PD#s
S000 305 - GS-09
S000 306 - GS-07
S000 307 - GS-05

Position Designation of National Security and Public Trust Positions

Position Designation Record

Agency Department for the Interior/U.S. Fish and Wildlife Service

Position Title Wildlife Inspector

Series and Grade/Pay Band GS-1801-~~112~~¹⁰J4

Position Description Number S000304

Duties	Degree of Potential for Compromise or Damage
<i>Other activities demanding a degree of public trust</i>	Moderate impact
Comments:	Ensures that laws and regulations regarding the import and export of fish and wildlife are met. Performs inspections, identification, and compliance duties.

Adjustment for program designation and level of supervision	
<i>Adjustment for Scope of Program and Correlation to Extent of Impact (see definitions)</i>	Worldwide or government-wide impact
<i>Adjustment for level of supervision or other controls</i>	Limited or no supervision - ability to act independently in almost all areas almost all of the time

Designation Level	Suitability	
	Investigation Required	Form Required
Tier 3	BI	SF 85P

Total Points Designation	
<i>Total Initial Position Designation Points from Step 2</i>	10
<i>Adjusted Position Designation Points from Step 3</i>	50

Signature: Joyce M. Hayes Date: 4/27/2009
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