

## Evaluation Statement

**Proposed Classification:** Senior Wildlife Inspector, GS-1801-13

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

**Reference:** OPM, JFS, Administrative Work in the Inspection, Investigation, Enforcement, and Compliance Group, 1800, 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 is a Senior Wildlife Inspector who serves as a subject matter expert for a Region, reporting to a Resident Agent in Charge. Incumbent is an acknowledged expert in the most diverse and complex inspection and compliance activities and applies this knowledge to advise on inspection activities and priorities.

**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 General Inspection, Investigation, Enforcement, and Compliance, GS-1801, may be constructed to reflect the

specific purpose and knowledge requirements for the work. Therefore the assigned title for this position is Senior Wildlife Inspector.

**Grade determination:** Administrative Work in the Inspection, Investigation, Enforcement, and Compliance Group, contains grade-level criteria for evaluating positions classified to the 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, Level 1-7, 1250 points

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.

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.

This position exceeds Level 1-7. At this level inspectors 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. While this position does require this level knowledge, the duties of this position goes beyond this level of knowledge, as the incumbent is required to: (1) define and institute new methods and strategies to meet key requirements and program objectives for the Service, (2) interpret and apply policies and guidance regarding inspections; and (3) serve as a subject matter authority in areas of inspection; which may involve reviewing and commenting on pending legislation or policy developed in Service headquarters,.

The knowledge requirements of the position meets the criteria for Level 1-8 where the inspector typically develops agency-wide policies, procedure, and strategies or provides expert technical advice, guidance, and recommendations to agency management and other inspectors on critical operations.

This position requires a comprehensive knowledge of state, Federal, and foreign laws, statutes, regulations, and treaties involving the take, transport, import, export, and humane shipment of wildlife to develops, analyzes, and evaluates new or modified program policies, regulations, goals, and objectives regarding regional inspections. In addition, this position is required to: (1) define and institute new methods and strategies to meet key requirements and program objectives for the Service, (2) interpret and apply policies and guidance regarding inspections; and (3) serve as a subject matter authority in areas of inspection; which may involve reviewing and commenting on pending legislation or policy developed in Service headquarters, therefore meeting Level 1-8.

## Factor 2, Supervisory Controls, Level 2-4, 450 points

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 2-4, the supervisor outlines overall objectives and available resources, discusses the projects and timeframes with the inspector, and determines the parameters of the employee's responsibilities. At this level, the inspector determines the avenues to pursue, decides the methods to apply and the approach to take, interprets policy and regulations and resolves conflict, coordinates cases across jurisdictional lines, and keeps the supervisor informed of progress and potentially controversial matters. At Level 2-4, the supervisor does not normally review the methods used but reviews completed work for soundness of overall approach, effectiveness in producing results, feasibility of recommendations, and adherence to requirements.

The incumbent works with a greater degree of independence than at Level 2-3 where the supervisor provides more assistance when work is assigned, the employee can rely more on accepted policies and practices, and work is reviewed more closely, e.g., the appropriateness of the employee's approach. The employee does not work with the independence characteristic of Level 2-5 where the supervisor typically provides only general administrative direction for assignments in terms of broad program objectives and resources of the agency.

## Factor 3, Guidelines, Level 3-4, 450 points

This factor covers the nature of guidelines and the judgment employees need to apply them. At Level 3-4, the investigator uses administrative policies and precedents that are applicable but stated in general terms. Guidelines for conducting new or innovative investigations or inspections are scarce or of limited use. The investigator uses initiative and resourcefulness in deviating from established methods to address specific issues or problems, identify and research trends and patterns, develop new methods and criteria, and/or propose new policies and practices.

This is comparable to the use of guidelines in this position. The SWI uses the laws, regulations, policies and procedures governing the Service which are applicable but stated in general terms. Guidelines for conducting new or innovative inspections are scarce or of limited use. The SWI uses initiative and resourcefulness in deviating from established to address specific issues or problems in complex inspections, identify and research trends and patterns, develop new methods and criteria, and/or propose new policies and practices for resolving complex investigations.

The use of guidelines exceeds Level 3-3 where guidelines for conducting investigations are available, although they may have gaps, and the employee is not required to develop new methods and criteria. The use of guidelines does not meet the criteria for Level 3-5 where guidelines are typically only broad policy statements and basic legislation that require extensive interpretations.

#### Factor 4, Complexity, Level 4-5, 325 points

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.

This position meets level 4-5. At this level, the work consists of the most significant and complex issues in areas of changing and/or conflicting policy or program requirements. The employee makes decisions and recommendations in situations complicated by uncertainty in approach, methodology, and/or interpretation. The employee must develop innovative strategies, approaches, or methods to serve as precedents or models for similar situations in the future.

The work consists of: (1) developing, analyzing, and evaluating new or modified program policies, regulations, goals, objectives regarding regional inspections; (2) defining and instituting new methods and strategies to meet key requirements and program objectives for the Service; (3) interpreting and applying policies and guidance regarding inspections; (4) serving as an advisor to the RAC on regional and national inspection issues for the inspection program including making recommendations regarding long-range planning; (5) assisting RAC in planning for evolving issues and changes in the complexity, variety and volume of wildlife trade or commerce; and (6) performing risk assessments using a variety of analytical tools and integrates information from a number of databases, which exceeds Level 4-4.

#### Factor 5, Scope and Effect, Level 5-4, 225 points

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 5-4, the work involves enforcing the protection of wildlife using advanced technical, identification, and operational expertise; and analyzing documents, trade histories, species identification, statutes, regulations, and policies to ensure compliance.

This is comparable to the scope and effect of the subject position. The purpose of the work is to provide advice and guidance to the RAC regarding the inspection program and to develop policy and guidance for the program and to function as a team lead for port or intra-regional task force activities to promote program effectiveness and efficiency and program operations, and to coordinate administrative and staff activities with senior level inspectors to execute focused effects to identify and interdict illegal trafficking. Work at this level may also include serving as a primary as a port, regional, or national subject matter expert on the identification of and trade in specific wildlife commodities or species of concern, and developing and coordinating regional strategies to interdict large-scale illegal wildlife trade based upon patterns and trends detected using intelligence and customs data. The work includes working closely with forensic lab staff to identify and develop field-level forensic techniques for species new to the wildlife trade or newly protected species where no pre-existing detection techniques may exist, and contributing to the nationwide effort to interdict illegal wildlife. The work includes coordinating with senior regional and national law enforcement officials within and outside the agency to develop inter-agency memorandums of understanding that

address enforcement coordination gaps by emphasizing risk analysis, expanded use of International Trade Data, and recommending improvements for increased and effective interdiction programs and activities. The work includes a significant level of independent investigative follow-up within jurisdictional hierarchies and increased interaction with legal counsel in formulating civil settlements, and assessing evidence for consideration in criminal proceedings. The work also includes interactions with international entities to coordinate data and information exchange in areas involving new identification techniques and current trends in wildlife smuggling.

The work exceeds the scope and effect of Level 5-3 where cases typically involve conventional problems and situation and the application of known solutions. The position does not meet the criteria for Level 5-5 where the work may serve as the basis for changes in the direction of major agency initiatives or in long-standing agency practices.

Factors 6 and 7, Personal Contacts and Purpose of Contacts, Level-6/7-3c, 180 points

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. Personal contacts are with investigators from Federal, State and local investigative agencies; officials of Native American tribes, foreign governments, and private industry; witnesses; informants; complainants; and the general public. Through appropriate channels, the incumbent has frequent contact within the Department of Interior with the Office of the Solicitor and with the U.S. Attorney in the Department of Justice. Contacts are typically in an unstructured setting and on a nonroutine basis. The extent of each contact is different.

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.

At Level c the purpose of contacts is to influence, persuade, interrogate, or control people or groups. The people contacted may be fearful, skeptical, uncooperative, or dangerous. Therefore, the employee must be skillful in approaching the individual or group to obtain the desired effect, such as gaining compliance with established policies or gaining information by establishing rapport with a suspicious informant.

This is identical to the nature of contacts in this position. Contacts are for the purpose of persuading or interrogating persons or groups. The persons contacted may be fearful, skeptical, uncooperative, or dangerous. The SWI must be skillful in approaching the individual or group to gain compliance with Service policies and regulations by

persuasion or negotiation, or gaining information by establishing rapport with a suspicious informant.

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, Level 8-2, 20 points

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. The work is primarily sedentary in nature. Travel to inspection sites will be required but will be based on needs and budget. Physical inspections of live animals and animal products always present hazards, often with the potential to be life threatening. Inspectors must insure that the proper safety guidelines and precautions are issued and followed: safety equipment is supplied, used, and maintained; and safety training is provided annually or as needed.

WI's 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, Level 9-2, 20 points

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 typically performed in an office setting. The physical inspection of shipments takes place 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. The position requires an annual physical.

The WI's are frequently involved in special staffing situations as directed by the Service. This includes work details of significant duration and frequency away from the main duty station. These details may include teaching classes at Special Agent Basic Training, WI Basic Training, WI In-Service, Field Training and Evaluation Program, performing inspections at non-designated ports of entry, and special projects which may deal with review of regulations and policies or developing new policies. WI's may also be required to assist Special Agents in the execution of search warrants.

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:**

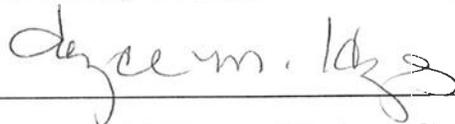
Factor	Level	Points
1. Knowledge Required by the Position	1-8	1550
2. Supervisory Controls	2-4	450
3. Guidelines	3-4	450
4. Complexity	4-5	325
5. Scope and Effect	5-4	225
6/7. Personal Contacts and Purpose of Contacts	6/7-3c	180
8. Physical Demands	8-2	20
9. Work Environment	9-2	20
Total		3220

The total points awarded are 3220. This falls within the range for GS-13 (3155-3600).

**Conclusion:** The appropriate classification for this position is Senior Wildlife Inspector, GS-1801-13.

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>	50
<i>Adjusted Position Designation Points from Step 3</i>	50

Signature:  Date: 4/27/2009  
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