



Position Management and Position Classification Handbook

Supplement to 225 FW 1

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Position Management and Position Classification Handbook

1. Background

This *Position Management and Position Classification Handbook (PMPC Handbook)* provides supplemental instructions for the U.S. Fish and Wildlife Service (Service) to implement 225 FW 1, *Position Management and Position Classification*, as well as Personnel Bulletin (PB) No. 18-03, [Position Management and Position Classification Policy Handbook \(Departmental Handbook\)](#), February 23, 2018 (Revised May 15, 2018), Department of the Interior (Department), Office of the Secretary. This *PMPC Handbook* also provides supplemental instructions for other related Service Manual chapters and PBs (see section 8, Appendix A, “References and Resources,” of this handbook).

Notes to readers:

1. Throughout this handbook, reference is given to the Chief, Human Resources Operations (HRO), the Human Capital Officer (HCO), and the Deputy HCO. When HRO, HCO, and Deputy HCO are referenced, the understanding is that they may delegate the work described to subordinates within their organizations unless otherwise noted.
2. This handbook often refers to “section 1.x,” which are references to specific sections within 225 FW 1, unless otherwise noted.
3. Acronyms are spelled out in section 10, [Appendix C, “Acronym Legend.”](#) of this handbook, and many are defined in section 9, [Appendix B, “Glossary of Key Terms.”](#) Note that in this handbook we use “Service” for the U.S. Fish and Wildlife Service and “FWS” for Federal Wage System.
4. Links to references are provided in section 8, [Appendix A, “References and Resources.”](#) of this handbook.

2. Delegation of Position Classification Authority

Table 1-1 Internal Controls Procedures

225 FW 1	Internal Controls Procedures
<p>A. Section 1.7 (in 225 FW 1) Delegation of Position Classification Authority</p>	<ol style="list-style-type: none"> 1. The Deputy HCO and HRO must assess training and reviewed experience of employee(s) prior to delegating position classification authority. They will determine appropriate level of delegated authority based on the assessments. <ol style="list-style-type: none"> a. Delegate specific grades based on assessments (e.g., delegated authority for grades 12 and below for GS and all grades below 11 for FWS). b. Only delegate authority for classifying supervisory positions after the Classifier has received specific training and reviewed experience in applying supervisory position classification standards, including making base level determinations. c. Finalize written delegation of authority memo based on assessments and following section 1.7 in 225 FW 1. d. Provide delegation memos to the employees. 2. The HRO must provide a copy of the delegation of authority memo along with the assessment supporting the specific delegation of authority, including training received and reviewed experience summary, to the Deputy HCO. 3. The Deputy HCO will maintain the Service’s records for delegation of position classification authority.

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<p>B. Section 1.8A Classification Validation</p>	<ol style="list-style-type: none"> 1. PDs with the following factor levels must be validated by the Deputy HCO per section 1.8A. <ol style="list-style-type: none"> a. Nonsupervisory GS factor levels of 1-9 (Knowledge Required by the Position), 2-5 (Supervisory Controls), 4-6 (Complexity), and 5-5 or 5-6 (Scope and Effect). b. GSSG factor levels of 1-4 or 1-5 (Program Scope and Effect), 3-4 (Supervisory and Managerial Authority Exercised), and 6-6 (Other Conditions). 2. The HRO will submit (using mySupport) the certified PD, evaluation statement, and primary organizational roster reflecting the position's organizational context to the Deputy HCO. 3. The Deputy HCO will review and evaluate the information and, if necessary, request additional information. Results of the review will be provided to the HRO with a written classification validation statement. 4. The HRO will store the classification validation statement with the PD record. 5. SPDs from the Department or Service are exempt from the classification validation process. However, other internal control measures may apply as communicated by implementing instructions for the specific SPDs and as described in section 1.8G. 6. The PD does not have to be revalidated for each vacancy if the PD and organizational context remain the same. However, other internal control measures such as described in section 1.8E may apply.
<p>C. Section 1.8B Classification of grade 15 PDs</p>	<ol style="list-style-type: none"> 1. The HRO will submit (using mySupport) the PD, evaluation statement and primary organizational roster reflecting the position's organizational context to the Deputy HCO. <ol style="list-style-type: none"> a. While the Deputy HCO will certify the PD, the HRO must provide an evaluation statement for the position. In other words, the HRO is recommending the Deputy HCO certify their evaluation of the position. b. The HRO should include the Deputy HCO in the conversations with the supervisor of the position when gathering information to evaluate the position. 2. The Deputy HCO will evaluate the position and certify if the position classification determination is grade 15. 3. If the Deputy HCO does not evaluate the position at grade 15, the Deputy HCO and HRO will discuss the position and determine the best way to resolve the differences in the evaluation and determine a best path forward (e.g., the position may be a GS-14, which would likely require certification by the HRO and validation by the Deputy HCO).
<p>D. Section 1.8C Accretion to Higher-Graded Duties</p>	<ol style="list-style-type: none"> 1. Accretion of duties noncompetitive promotion actions are rare and will be handled on a case-by-case basis between the HRO and the Deputy HCO.

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<p>E. Section 1.8D Grade Stacking</p>	<ol style="list-style-type: none"> 1. According to Departmental Policy FAQs (dated 4/20/2021), the Deputy HCO may delegate authority to the HRO to approve grade stacking situations. However, the authority must not be delegated further. 2. If the Deputy HCO delegates grade stacking approval authority to the HRO: <ol style="list-style-type: none"> a. The HRO will follow the Departmental Handbook and accompanying FAQs to complete a comprehensive evaluation statement that includes analysis of position management implications and alternatives associated with the grade stacking structure and will document approval of the position. The HRO will gather position management rationale and justification from the supervisor who is proposing the grade stacking situation and incorporate this information into the comprehensive evaluation statement. The approval documentation will be stored with the PD record. 3. If the Deputy HCO retains the grade stacking approval authority: <ol style="list-style-type: none"> a. The HRO will submit (using mySupport) a comprehensive evaluation statement (as described in 2.a. above) to the Deputy HCO for review and approval. b. If the Deputy HCO approves the grade stacking situation, the Deputy HCO will provide the HRO with documentation of the approval. The HRO will store documentation with the PD record. c. If the Deputy HCO does not approve of the grade stacking situation, the Deputy HCO and the HRO will discuss and determine a path forward (e.g., redesign the organizational structure, rewrite PD).
<p>F. Section 1.8E Major Duty Assignments Outside of the Program Chain of Command</p>	<ol style="list-style-type: none"> 1. The supervisor of the position and the Classifier work collaboratively to gather information and written approval 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 descriptive factors related to the program’s major duties. The written information from the program manager will be included with the PD and evaluation statement. The evaluation statement for the position will clearly and separately evaluate the program’s work. Examples include: <ol style="list-style-type: none"> a. A refuge wants to add Wildlife Investigator duties to one of their PDs. b. A Region is given Servicewide responsibility and authority over X program and they build this major duty into one of their positions. 2. 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. 3. The program manager over the program work being performed will coordinate with their Classifier to ensure the position is annotated on the program manager’s primary organizational roster with the associated percentage of time that the position is performing work for their organization. The program manager will also provide performance evaluation feedback to the supervisor of record in regard to work assignments being performed by the employee for that program manager.

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	<ul style="list-style-type: none"> a. Should the supervisor of the position choose to remove the program work from the position or to not assign the work to the employee, the accuracy of the PD must be addressed. The program manager must be notified of changes that impact the accomplishment of the program work. 4. For Department work being officially described by and assigned to PDs within the Service, the supervisor of record and the Classifier follow the same steps outlined above in relation to Department work <u>or</u> reference formal delegation of authority from the Department.
G. Section 1.8G GS-13 and Higher SPDs	<ul style="list-style-type: none"> 1. Authorization for using GS-13 and above SPDs outside of the program manager’s chain of command will include a statement from the designated 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 program manager will be maintained with the PD record and must be requested and received for each recruitment or staffing action using GS-13 and above SPDs. 3. Follow additional instructions in section 1.8E if the work in the SPD is outside the program manager’s chain of command.
H. Section 1.8H Firefighter and Law Enforcement	<ul style="list-style-type: none"> 1. The HRO will submit the special retirement coverage recommendation package to the Service Fire or Law Enforcement Program Manager for approval and signature. <ul style="list-style-type: none"> a. The recommendation package must include the certified (i.e., classified) PD, evaluation statement, primary organizational roster for the position, functional statements for the organization, and recommendation memo from the HRO and Service Fire/Law Enforcement Program Manager to the Department Office of Human Capital through the Service Human Capital Office. b. The recommendation memo will address the specific criteria listed on the “DOI Checklist for Recommendation of Special CSRS/FERS Coverage for Law Enforcement or Firefighter Position.” The memo must include the Checklist as an attachment. The Checklist is located on the FLERT website. 2. The HRO will submit the complete recommendation package to the Deputy HCO (using mySupport). 3. The Deputy HCO will work with the Department to facilitate the special retirement coverage request and approval. 4. The Deputy HCO will provide the final documents to the HRO. 5. If the PDs are approved for special retirement coverage, the HRO will ensure proper storage of the PDs, which includes ensuring the PDs are not altered in any way with the exception of the supervisory certification for future staffing actions.

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I. Sections 1.8I-N	<ol style="list-style-type: none"> 1. The HRO will work through the appropriate program managers to gather required approvals. 2. Ensure approval documentation is filed with the PD record for accountability and review purposes. 3. <i>Additional implementing guidance for section 1.8K is under development.</i>

3. Position Management

A. Functional Statements

1. Functional statements describe the mission, purpose, and official roles and responsibilities of an organizational component. Classifiers and supervisors must ensure organizational and position management analysis and decisions align with the organization’s functional statements.
2. Supervisors and managers must develop and maintain functional statements as described in section 1.9 of 225 FW 1 and 020 FW 1, *Organizational Management*.
3. Functional statements are associated with organization codes and are maintained by the Regions/programs in HCMS.

B. Organizational Rosters and Charts

1. Per section 1.10 of 225 FW 1, the FAIR Inventory will be used as the baseline data for creating and maintaining primary organizational rosters.
2. Primary organizational rosters will include the official OPM title, organizational title (if applicable), pay plan, series, and FPL grade of each position certified by a Classifier. Positions that are not certified will be shown as vacant and will be identified by their role or organizational title and not by official OPM title, series, and grade.
3. Primary organizational rosters will clearly show supervisory chains of command to support evaluations of base level and supervisory ratios.
4. Primary organizational rosters will include positions that are performing work for and on behalf of the organization but not in the direct supervisory chain of command, such as the work described in section 1.8E of 225 FW 1.
5. The Deputy HCO will coordinate the development of primary organizational rosters.
6. The Deputy HCO will coordinate the annual reconciliation of primary organizational rosters with the annual FAIR Inventory. The Deputy HCO will request each Directorate member to update and reconcile their organizational charts in OCX with their certified FAIR Inventory and will assign staff to update and reconcile primary organizational rosters Servicewide.
7. Classifiers will maintain the primary organizational rosters throughout the year.
8. The HRO will determine the most effective way of storing (e.g., OCX, SharePoint) and organizing the primary organizational roster.
9. Directorate members may use OCX to create organizational charts for forecasting, proposing changes, or other management or planning purposes. However, the primary organizational rosters, maintained by the HRO, will serve as the baseline data when working with the HRO to discuss specific HR actions.
10. Organizational names used in the primary organizational roster will correlate and reconcile with organizational names in FPPS.

C. Workforce Planning

1. Supplemental to the requirements in section 1.11 of 225 FW 1, supervisors are to develop workforce succession plans that are evidence-based assessments and include human resources needs that are aligned with mission, strategic goals, and budget. Plans are to be developed and updated in accordance with PB No. 21-11, *Departmental Workforce and Succession Planning Policy*.
2. Supervisors and managers are responsible for workforce planning. HR is a strategic partner and adviser to supervisors and managers in all phases of workforce planning. Below are workforce planning considerations and steps:
 - a. **Mission.** Functional statements can be used in workforce planning to assess and ensure alignment of current and projected activities with the mission of the organization.
 - b. **Supply and Demand.** Primary organizational rosters are used in workforce planning to assess current workforce (i.e., supply) and projected workforce needed to perform projected activities (i.e., demand).
 - c. **Gap Analysis and Strategies.** Workforce planning involves gap analysis (i.e., difference between supply and demand) and developing strategies to address the gap. Strategies include:
 - i. Strategic recruitment
 - ii. Reassignment and realignment of positions
 - iii. Training/retooling
 - iv. Restructuring organizations
 - v. Contracting work out
 - vi. Succession planning
 - vii. Establishing mentorship programs
 - viii. Leveraging technology
 - ix. Revising inefficient or ineffective business practices
 - x. Establishing formal knowledge transfer and formal position backup plans
 - d. **Implementation.** Make decisions as to who, what, when, and how the strategies will be implemented. Develop actionable steps and milestones and identify resources needed.
 - e. **Monitor, evaluate, repeat.** Workforce planning is not a “check the box” activity. Workforce planning is something management and their HR consultants regularly address.
 - f. **Every vacancy is an opportunity to reassess.** Reassess organizational structures, position characteristics (e.g., major duty assignments, KSAs, role, and context), distribution of work within the organization, and the need for the position now and into the future. The PD Worksheet is a helpful tool that guides supervisors through this reassessment and can be found on the [JAO HR Classification SharePoint](#).

4. Standard PDs

1. Supplemental to sections 1.12 through 1.15 of 225 FW 1, see section 11, Appendix D of this handbook for general implementing instructions for Department SPDs and see the [JAO HR Classification SPD SharePoint](#) for series-specific and Servicewide SPD implementing instructions. [*Note: JAO HR Classification SPD SharePoint is under development; not all SPDs and instructions are currently loaded.*]
2. Servicewide SPDs may be accessed on the [JAO HR Classification SPD SharePoint](#) and are also loaded into PDX.
3. Departmental SPDs may be accessed on the [Department’s Office of Human Capital SPD Library](#), the [JAO HR Classification SPD SharePoint](#), and are also loaded into PDX.
4. Section 1.15 of 225 FW 1 addresses exceptions to the SPD policy.

- a. For exceptions to Servicewide SPDs, submit requests [*template under development*] to the Deputy HCO following policy in section 1.15A of 225 FW 1 and using mySupport. The Deputy HCO will respond with a written decision. If an exception is granted, the HRO will store the written decision with the PD record.
- b. For exceptions to Departmental SPDs, submit requests to the Deputy HCO following policy in section 1.15B of 225 FW 1 and using mySupport. Use the exception memo template found on the [Department's Office of Human Capital SPD Library](#). The HRO will store the written decision from the Department with the PD record.

5. Writing PDs

A. PD Worksheet

The PD Worksheet is a one stop thought collector that can be used for position management analysis and documentation, PD and comprehensive evaluation statement, EPAP, employee development plan, job analysis, vacancy announcement, and interview questions. The PD Worksheet can be found on the [JAO HR Classification SharePoint](#). Use guidance from the PD Format section below to inform completion of the PD Worksheet. The steps in the PD Worksheet are as follows:

1. **Step 1 - Position Management.** Address position management considerations by answering questions and documenting answers for an historical record of the position.
2. **Step 2 - Primary Purpose of the Position.** Address primary purpose of the position and the critical elements/major duties of the position by answering questions and documenting answers.
3. **Step 3 - Factor Level Descriptions and Other Considerations.**
 - a. Transfer major duties from Step 2 to Step 3 and answer questions specific to each individual major duty.
 - b. Answer the questions pertaining to supervisory controls, physical demands, and work environment.
 - c. Answer questions pertaining to additional position determinations such as financial filer.
 - d. Answer questions that will help develop job analysis, job announcement, and interview questions.
4. **Step 4 – Discuss.** Discuss worksheet with an HR Specialist who will provide guidance on transferring the information to the various forms, templates, and systems for a variety of HR uses and functions. It is important to note that discussion with an HR Specialist takes place with every step.

B. PD Format

A PD is a forthright presentation of the work assigned by management to the position. For more information on PDs, including major duties and FES factors, see OPM's *The Classifier's Handbook*, Chapter 3, "Position Descriptions." PDs contain the following information:

1. **Introduction.** A statement of the primary purpose of the position and its relationship to the organization (i.e., organizational context).
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 related duties as assigned." No percentage of time is assigned to this statement.

- c. Critical elements in the EPAP relate to major duties and responsibilities. The first sentence in a well-written major duty statement could be the critical element statement in the EPAP.
 - d. Minor duties that are important to the overall work may also be added to the PD in accordance with the [Departmental Handbook](#), section 2.7, “Minor Duties.”
 - e. Collateral duty assignments will be addressed as described in the *Departmental Handbook*, section 2.14, “Collateral Duty Assignments.”
 - f. For supervisory positions written in formats following either the 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. 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. **Other Factor Evaluation System Factors.** 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. **Narrative Format.** For GS nonsupervisory PDs evaluated using narrative classification standards, the PD must include information that supports evaluation by the narrative standard (e.g., nature of assignment, level of responsibility). The PD may follow the format of the narrative standard or may be written in the FES format. If written in narrative format, the PD must also include a description of the KSAs, physical demands, and work environment.
 6. **Responsibility, Physical Effort, and Working Conditions.** 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. **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 percent 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 percent of the time, travel during the work day for field surveys, which typically involves working around moving water and requires the use of Personal Protective Equipment (PPE) 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 field surveys 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”).
8. **Other Significant Facts.** The section “Other Significant Facts” may be added at the end of the PD as explained in the [Departmental 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 KSAs required to be appointed to the position.
9. **Supervisory Standard.** 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 and physical demands and work environment regardless of whether the grade is based on supervisory or technical responsibilities.
 - a. **Deputy PDs.** For positions that meet the full definition of Deputy in the GSSG and the Deputy rule is applied to derive the grade, supervisors will use the PD to which the position is a Deputy.
10. **Pathways PDs.** 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*.

C. Unclassified Duties

Section 1.16C(1) of 225 FW 1 addresses unclassified duties. The statement of duties may be a list of duties and tasks that the employee will perform during their detail. The statement of duties is unclassified (i.e., position classification determination has not been certified by a Classifier) and, therefore may not be copied in its entirety from a classified PD.

6. Evaluating and Certifying Positions

A. Evaluation Statements

1. Comprehensive evaluation statements will be written for and attached to FPL PDs covered by the GS and FWS and for any position that is being submitted for classification appeal. [Departmental Handbook](#), section 2.22, “Comprehensive Evaluation Statements,” addresses the Department’s policy.
2. Regardless of whether the PD is FPL or solely used as a career ladder, FES PDs must contain the point values for each factor, total points with grade conversion, and position classification standards referenced (see *Departmental Handbook*, section 2.6, “Standards of Adequacy”). This information may be on the PD or in an attached evaluation statement.
3. Comprehensive evaluation statements must be stored with the PD record and must contain the following information:

- a. **Background:** Background information identifying 1) why the position is being evaluated or established or explaining the significant changes if the position is being redescribed or re-evaluated; 2) organizational context; and 3) position management information and analysis that addresses the *Departmental Handbook*, section 1, “Position Management.”
- b. **References:** Reference 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; and an explanation of why the specific standard(s) or guide(s) were selected to derive the position classification determination of the position.
- c. **Final Position Classification Determination:** Pay plan, 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. For supervisory and lead positions, provide evaluation of the supervisory/lead responsibilities and coverage under the supervisory/lead standard, as well as the personally performed technical responsibilities.
 - i. **Pay Plan:** Pay System is the first decision to make when classifying a position. Once the System is identified, the Pay Plan must be determined.
 - ii. **Series:** Once the pay system is determined, the series of the position must be evaluated. OPM's *Handbook of Occupational Groups and Families* is an invaluable resource in addition to the *Introduction to the Position Classification Standards (Introduction)* and *The Classifier's Handbook*.
 - iii. **Grade:** Evaluating for grade is the next step. Use all the resources referenced. GS grades must be evaluated based on the Classification Act of 1949 (the Law). OPM was given charge of carrying out the Law which states that, "standards issued by OPM shall: Define the various classes of positions in terms of duties, responsibilities, and qualification requirements; Establish official class titles; and Set forth the grades in which the classes of positions have been placed. Based on this statutory guidance, OPM has developed an occupational structure and classification system for positions included in the General Schedule." (*Introduction* online, page 2). Public Law 92-392 established the current Federal Wage System and is similar in intent.
 - iv. **Title:** Positions must be titled, including parenthetical titles, in accordance with OPM standards and guidance. For open titling determinations, establish consistent titling practices with similar/like positions. Organizational titles cannot be official OPM titles and must accurately represent the role of the position. Refer to OPM's *Introduction*, Section III, Paragraph H, for more information on titling. Specific Department titling policy can be found in the [Departmental Handbook](#), sections 2.5 and 2.11. Positions on SPDs must be titled according to the policy and implementing instructions associated with the SPD.
 - v. **Functional Classification:** Refer to OPM's *Introduction*, Appendix 2, “Functional Classification for Scientists and Engineers,” to evaluate and assign functional classification codes for scientist and engineer positions. The functional classification code must be entered into FPPS. The code is captured on the PD cover page. Address evaluation of the functional classification code in the evaluation statement. The final position classification determination for these positions must include the functional classification code.
- d. **Base Level Evaluation:** 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, is required. Classifiers must follow the instructions in [Appendix E, “Instructions for Calculating](#)

[Base Level.](#)” to evaluate and document base level calculations. The base level spreadsheet must be attached to or included in the comprehensive evaluation statement.

- e. **Deputy Positions:** For positions meeting the Deputy definition in the GSSG, the comprehensive evaluation statement must address application of the GSSG deputy definition and rule.
 - f. **Grade Stacking:** For grade stacking positions, the comprehensive evaluation statement must address the requirements described in the *Departmental Handbook*, section 2.12, “Grade Stacking,” and its associated Frequently Asked Questions (FAQs). Additionally, the approval memo must be attached as supporting documentation (see section 2.E, Table 1-1 in this handbook)
 - g. **Accretion of Duties:** 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 *Departmental Handbook*, section 2.17, “Accretion of Higher-Graded Duties,” and must be approved and authorized by the Deputy HCO. The HRO must consult with the Deputy HCO prior to moving forward on any action that may entail accretion of duties (see section 2.D, Table 1-1 in this handbook).
4. It is important to note, and worth quoting from *The Classifier’s Handbook*, that there are factors NOT considered when determining the grade level of a position. They are: “volume of work, financial need of the employee, salary comparability, quality of work, efficiency of performance, the employee’s length of service, difficulty in recruiting for the occupation, or duties performed only in the absence of another employee” (*The Classifiers Handbook*, Chapter 5, “Determining the Grade” online page 39).

B. Documentation and Certification of Position Classification Determination

1. Final position classification determinations will be documented and certified using the approved PD cover page in accordance with requirements in the [Departmental Handbook](#) and the following:
 - a. Supervisors must certify the PD by signing (electronic signature preferred) the PD cover page. Depending upon the PD, this is either an OF-8, HC-08, or the cover page in PDX. By certifying the PD, supervisors are certifying the following statement:

I certify that this is an accurate statement of the major duties and responsibilities of this position and its organizational relationships and that the position is necessary to carry out Government functions for which I am responsible. This certification is made with the knowledge that this information is to be used for statutory purposes relating to, but not limited to: FLSA determinations; position sensitivity and requirements; and appointment/payment of public funds. False or misleading statements may constitute violations of such statutes or their implementing regulations.
 - b. Only Classifiers with delegated position classification authority commensurate with the final position classification determination may certify the PD cover page. By certifying the PD, Classifiers are certifying the following statement:

I certify that this position has been classified/graded as required by Title 5, U.S. Code, in conformance with standards published by the U.S. Office of Personnel Management or, if no published standards apply directly, consistently with the most applicable published standards.
 - c. The final, certified PD cover page must remain with the certified PD that was evaluated. Should the PD be changed, a new PD cover page must be created, certified, and attached to the changed PD.
 - d. When the supervisor and/or Classifier recertify a PD, they are certifying the same certification statements. See section 7.A, Table 1-2 of this handbook.

- e. It is important to note that both the Classification Act of 1949 (established the General Schedule) and Public Law 92-392 (established the Federal Wage System) were established based on the principle of providing equal pay for substantially equal work. Certification by the supervisor and the Classifier is part of carrying out this important principle and purpose.

C. Other Position Classification Determinations

1. Fair Labor Standards Act (FLSA) determinations are to be made and documented in accordance with Departmental policy found in PB No. 21-06 (551), *Fair Labor Standards Act Overtime Pay Entitlement*.
 - a. PB No. 21-06 includes a worksheet that must be completed by Classifiers for all positions determined to be exempt.
 - b. Final FLSA determination is annotated by the Classifier on the PD cover page and in FPPS as either “N” for nonexempt or “E” for exempt.
 - c. PB No. 21-06 also describes FLSA claims and procedures for filing FLSA claims.
2. Position sensitivity and position risk designations for all covered positions will be made by the Classifier using the Position Designation Automated Tool (PDT) [*Servicewide benchmark guidance under development*].
 - a. The PDT generates a Position Designation Record (PDR) that the Classifier must date at the time of the designation. The PDR must be stored with the PD record.
 - b. Final designations are annotated by the Classifier on the PD cover page and in FPPS [*FPPS coding guidance under development*].
3. Determinations of whether a position requires career employees to file a Confidential Financial Disclosure Report (Form OGE-450) will be made using guidance from the Department and the Service, as well as 5 CFR 2634.904.
 - a. Position-based determinations will be documented by the Classifier on the PD cover page and in FPPS [*Servicewide benchmark guidance and FPPS coding guidance under development*].
4. Cybersecurity Data Standard Codes will be assigned to all positions by using the NICE Cybersecurity Workforce Framework and the Cybersecurity Data Standard Code Determination Checklist.
 - a. Classifiers ensure checklists are completed and attached to all PDs as part of the PD record.
 - b. Classifiers annotate Cybersecurity Data Standard Codes on the PD cover page and in FPPS.
5. Bargaining Unit Status (BUS) codes will be determined and documented by Classifiers on the PD cover page and in FPPS.
6. Drug Testing Designated Positions (TDP) will be determined based on applicable regulations and the Department’s and Service’s policy and guidance and will be documented by Classifiers on the PD cover page and in FPPS [*Servicewide benchmark guidance and FPPS coding guidance under development*].
7. Medical standards or medical surveillance requirements will be determined using the most applicable regulation, policy, and guidance and will be documented by Classifiers on the PD cover page. Any medical requirement must be supported by the major duties of the position.
8. Telework suitability will be determined based on PB No. 21-07, *Telework Program*, section 7.A.(1), and will be documented as either suitable or not suitable by the Classifier on the PD cover page and in FPPS as either code “2” for positions that are not suitable for telework with the exception of emergency situations, or “4” for positions that are suitable for telework.
9. Competitive Area Codes will be determined by the servicing HR office in accordance with applicable OPM, Departmental, and Service policy and/or guidance [*Service guidance under development*] and will be documented by the Classifier 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*.

10. Position requirement determinations (e.g., driver’s license, commercial driver’s license, required occupancy, uniform, boat operation, land surveyor registration, pesticide applicator certification) must be supported by the major duties in the PD and regulation, policy, and guidance.
 - a. Position requirement determinations will be documented in the PD under “Other Significant Facts.” Reference to applicable regulations, policies, and guidance must be clearly stated.
 - b. Classifiers will include analysis of the position requirement(s) in the comprehensive evaluation statement, showing the connection between the requirement(s) and the major duties in the PD and the applicable regulations, policies, and guidance.
 - i. To require a State driver’s license in a position, see [Appendix F, “State Driver’s License Requirement Determination”](#) for determination criteria and documentation instructions.
 - c. Classifiers will annotate position requirements on the PD cover page and in FPPS where applicable.

7. Maintaining and Updating PDs and SPDs

A. Recertification

Certification of a PD entails a supervisory signature certifying that the major duties, responsibilities, and organizational context of the position are accurate and that the position is necessary to carry out the mission of the organization (see section 6.B(1)(a) of this handbook). Certification also requires the signature of an individual with delegated position classification authority certifying that the position has been classified in accordance with 5 U.S.C., and in conformance with OPM standards (see section 6.B(1)(b) of this handbook).

Recertification of a PD entails actions described in Table 1-2 below (see section 6.B(1)(d) of this handbook). Recertification actions must incorporate and address requirements for position management in 225 FW 1, section 1.11 and for maintaining and updating PDs in section 1.18.

Table 1-2 Recertification

Recertification Scenarios	HR Action	Supervisor Action
A. PD’s original classification is older than 5 years old or the PD has been identified as needing to be reviewed*; and PD is not an SPD; and PD is being used for recruitment and/or other personnel actions to include appointment, promotion, demotion, reassignment, transfer, and detail, or temporary promotions for more than 120 days.	1. Classifier must certify the PD. This entails position management review and position classification evaluation and certification. This is not recertification.	2. The supervisor addresses principles of position management and reviews the PD for accuracy, updating PD for current mission accomplishment. 3. Supervisor must certify the PD. This is not recertification.

Recertification Scenarios	HR Action	Supervisor Action
<p>B. PD's original classification is less than 5 years old <u>and</u> the PD has not been identified as needing to be reviewed*; <u>and</u> PD is not an SPD; <u>and</u> PD is being used for recruitment and/or other personnel actions to include appointment, promotion, demotion, reassignment, transfer, and detail, or temporary promotion for more than 120 days.</p>	<ol style="list-style-type: none"> 1. Classifier ensures position management is reviewed and PD is recertified by supervisor. 2. For supervisory PDs, Classifier ensures base level calculation is still accurate and that supervisory ratios (1:4) are met. Follow A.1 if calculation is not accurate or ratio is not met. 3. If PDR is older than 3 years, ensure position designation is still accurate and initial and date PDR. 	<ol style="list-style-type: none"> 4. The supervisor addresses principles of position management and reviews PD for accuracy. 5. If the position is necessary, organizational context applies, and the PD is accurate, the supervisor recertifies by providing initial and date on the PD cover page. 6. If the PD does not meet any of the criteria stated above, the supervisor works with the Classifier to discuss best path forward for adequately describing the work required to accomplish the mission.
<p>C. PD is an SPD.</p>	<ol style="list-style-type: none"> 1. Departmental SPDs are certified at the Department level and bureau SPDs are certified at the bureau level. 2. Classifier ensures position management is reviewed and PD is recertified by supervisor. 3. For supervisory PDs, Classifier ensures base level calculation aligns with SPD and that supervisory ratios are met. 4. If PDR is older than 3 years, ensure position designation is still accurate and initial and date PDR. 	<ol style="list-style-type: none"> 5. The supervisor addresses principles of position management and reviews SPD for accuracy. 6. If the position is necessary, organizational context applies, and the SPD is adequate, the supervisor certifies the PD cover page or recertifies by providing initial and date on the PD cover page. 7. If the PD is not adequate, the supervisor works with the Classifier to discuss best path forward for adequately describing the work required to accomplish the mission.
<p>D. SPD/PD was recertified by the supervisor less than a year ago.</p>	<ol style="list-style-type: none"> 1. No action necessary unless PD is identified as needing to be reviewed in which case, see A.1. 	<ol style="list-style-type: none"> 2. No recertification necessary. Submission of the FPPS action is sufficient recertification documentation.
<p>E. PD is to be used for a temporary seasonal (1039 hour appointments), authorized for recruitment through the Service's formal approval processes, <u>and</u></p>	<ol style="list-style-type: none"> 1. No action necessary. 	<ol style="list-style-type: none"> 2. No recertification necessary. Formal approval process is sufficient recertification documentation.

Recertification Scenarios	HR Action	Supervisor Action
PD is not older than 5 years old <u>or</u> has not been identified as needing to be reviewed.		
F. PD is to be used for temporary promotions or details lasting <u>less than 120 days</u> or for <u>emergency appointment</u> .	1. Classifier ensures position management is reviewed and PD is appropriate for the action.	2. No recertification is necessary; however, supervisor must ensure the position is necessary, organizational context applies, and the PD is adequate.

* Position has been identified by HR or auditors as a position needing classification review or correction or the classification is based on impact of the person.

B. PD Amendments

1. Position Classification Amendment Form, DI-625 (found on [JAO HR Classification SharePoint](#)), is to be used in accordance with the [Departmental Handbook](#), section 2.8, “PD Amendments,” and as follows:
 - a. The DI-625 must be signed by both the supervisor and the Classifier. The HRO must attach the amendment to the PD and store it with the PD record.
 - b. The HRO must provide copies of the DI-625 to the supervisor and employee and file in the employee’s eOPF as part of the PD.
 - c. Use of the DI-625 to record position changes is limited to two amendments. If more amendments are necessary, the PD must be redescribed.
 - d. Collateral duty assignments will be documented using the form and processed as described in the [Departmental Handbook](#), section 2.14, “Collateral Duty Assignments.”

8. Appendix A. References and Resources

1. Adverse Actions – 5 CFR Part 752 (online [eCFR search](#))
2. Agency Promotion Programs – 5 CFR 335.103
3. Civil Service Reform Act of 1978; Merit System Principles 5 U.S.C. 2301; Prohibited Personnel Practices 5 U.S.C. 2302 (online [U.S.C. search](#))
4. Classification Act of 1949 (as amended); 5 U.S.C. 51 – Classification; 5 CFR Part 511 – Classification under the GS
5. Confidential Filer Defined – 5 CFR 2634.904
6. Definitions, application (agency, employee, position) – 5 U.S.C. 5102
7. Definitions, application (supervisor) – 5 U.S.C. 7103(a)(10)
8. Delegated Authorities – 5 CFR 250.102
9. Fair Labor Standards Act (FLSA) of 1938, as amended; 29 U.S.C. Chapter 8: Fair Labor Standards; 5 CFR Part 551 – Pay Administration under the Fair Labor Standards Act
10. Federal Activities Inventory Reform Act of 1998, Pub. L. 105-270 (online [Public Law search](#))
11. Federal Wage System, Pub. L. 92-392, dated August 19, 1972; 5 U.S.C. 53 – Pay Rates and Systems; 5 CFR Part 532 – Prevailing Rate Systems, Subpart F – Job Grading System and G – Job Grading Reviews and Appeals; [FWS Appropriated Fund Operating Manual](#), Subchapter S7, Job Grading Appeals
12. Grade and Pay Retention – 5 CFR Part 536
13. Reduction in Force – 5 CFR 351
14. OPM [The Classifier's Handbook](#); *Introduction to the Position Classification Standards* ([Introduction](#)), and [Introduction to the Federal Wage System Job Grading System](#)
15. OPM [Federal Wage System Job Grading Standard for Supervisors](#), December 1992
16. OPM [General Schedule Supervisory Grade Evaluation Guide](#) (GSSG), June 1998
17. OPM [Handbook of Occupational Groups and Families](#), December 2018
18. OPM [Pathways Programs Handbook](#), August 2016, page 16
19. OPM [Workforce Reshaping Operations Handbook](#), March 2017
20. [Secretarial Order No. 3378](#), Improving the Department of the Interior Freedom of Information Act Program, January 7, 2020
21. [112 Departmental Manual \(DM\) 19](#), Office of Civil Rights, November 29, 2011
22. [112 DM 24](#), Office of the Chief Information Officer, January 19, 2017
23. [242 DM 2](#), General Administrative Delegation, May 11, 1993
24. [370 DM 430](#), Performance Management System, October 1, 2018
25. [470 DM 1](#), Public Communications, General Policy and Procedures, March 7, 2012
26. Departmental Personnel Bulletin ([PB No. 00-4 \(311\)](#)): *Personnel Officer Positions – Personnel Appointment or Change*, February 7, 2000
27. [PB No. 12-09](#): *Establishing and Maintaining Competitive Areas*, August 31, 2012
28. [PB No. 13-04](#): *The Department of the Interior Pathways Programs*, May 7, 2013
29. [PB No. 17-13](#): *Excepted Service Policy*, Appendix A. Identifying Attorney Positions, November 15, 2017, as amended April 29, 2018
30. [PB No. 17-15](#): *Drug-Free and Alcohol-Free Workplace Plan*, October 26, 2017
31. [PB No. 18-03](#): *Position Management and Position Classification Policy Handbook* ([Departmental Handbook](#)), February 23, 2018 (Revised May 15, 2018), Department of the Interior, Office of the Secretary; [Policy Frequently Asked Questions and Answers](#), 4/20/2021.
32. [PB No. 20-06](#): *Departmental Remote Work Policy*, July 23, 2021

33. [PB No. 20-10](#): *Department of the Interior/Office of Human Capital Standard Position Descriptions*, August 13, 2020.
34. [PB No. 21-06 \(551\)](#): *Fair Labor Standard Act Overtime Pay Entitlement*, May 28, 2021
35. [PB No. 21-07](#): *Telework Program*, July 23, 2021
36. [PB No. 21-11](#): *Departmental Workforce and Succession Planning Policy*, December 21, 2021
37. [020 FW 1](#), *Organizational Management*, November 15, 2022
38. [115 FW 3](#), *Approval for Communications and Outreach Positions*, May 18, 2012
39. [223 FW 1](#), *Detail of Employees*, May 28, 2004
40. [223 FW 10](#), *Mandatory Use of the Human Capital Management System (HCMS)*, September 10, 2015
41. 225 FW 1, *Position Management and Position Classification*, date (forthcoming with publication of this handbook)
42. [283 FW 2](#), *Disposition Schedules*, August 30, 2006
43. [291 FW 1](#), *Federal Activities Inventory Reform (FAIR) Act*, April 24, 2008

9. Appendix B. Glossary of Key Terms

1. **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.
2. **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 General Schedule (does not apply to WG), permanent appointments.
3. **Certification.** In the context of certifying the PD cover page, certification is when the supervisor and the Classifier apply their signature and date to the PD cover page attesting to the applicable certification statement on the PD cover page (see section 6.B(1)(a)(i) and 6.B(1)(b)(i) of this handbook for certification statements). Recertification is when the supervisor or Classifier attest to the same certification statements by initialing and dating in the designated recertification location on the PD cover page (see section 7.A, Table 1-2, of this handbook for more information).
4. **Classification Validation Determination.** The results of a review by the Deputy HCO of the HRO's classification evaluation of certain factor levels. The review results in the Deputy HCO either concurring or not concurring with the HRO's evaluation.
5. **Classifier.** An employee with delegated position classification authority who is authorized to certify position classification determinations as delegated.
6. **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.
7. **Consistency Review.** A review of the position classification determinations of identical, similar, or related positions by a classifier. A consistency review takes place when a change in position classification results from a Service or Department employee position classification appeal decision, an OPM classification certificate, or a classification determination resulting from a classification validation third-party review, or if, at any time, the Department or the Service 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.
8. **Delegated Position Classification Authority.** The authority to certify position classification determinations. This authority is delegated from the Secretary of the Interior to the U.S. Fish and Wildlife Service (242 DM2.1.E). Classification authority is delegated within the Service as described in 225 FW 1, section 1.6, *Responsibilities*.
9. **Desk Audit.** A term used to describe additional fact-finding steps taken by the classifier to obtain, validate, or clarify the information contained in the PD sufficient to make a position classification determination. Desk audits may include telephone or onsite 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 *Departmental Handbook*, section 2.16, *Desk Audits*.
10. **Employee.** An individual employed by the Service, not including contractor personnel and volunteers.

11. **Employee Position Classification/Job Grading Appeal.** A formal written request submitted by a GS or WG employee for formal review of their position's classification determination (e.g., pay system, occupational series, title, or grade) by the Service, the Department, and/or OPM.
12. **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.
13. **Fair Labor Standards Act (FLSA).** A law passed in 1938 that establishes minimum wage, overtime pay, recordkeeping, and youth employment standards affecting employees in the private sector and in the Federal, State, and local governments.
14. **Federal Activities Inventory Reform (FAIR) Act Inventory.** The FAIR Act inventory is required by the Federal Activities Inventory Reform Act of 1998 (P.L. 105-270) and OMB Circular A-76 – Competitive Sourcing. For the purposes of this handbook, the inventory represents the number of positions, both encumbered and vacant, by organization code.
15. **Federal Personnel and Payroll System (FPPS).** The Department of the Interior's integrated, online, and real-time automated personnel and payroll system.
16. **Federal Wage System, or Wage Grade (WG).** 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 handbook, WG includes employees in the Wage Grade (WG), Wage Leader (WL), and Wage Supervisor (WS) pay plans.
17. **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.
18. **Functional Statement.** The description of the mission, purpose, and official roles and responsibilities of an organizational component.
19. **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.
20. **Grade Stacking.** Grade stacking occurs when a position is established at the same grade as the supervisor over that position.
21. **Major Duties.** Duties that represent the primary reason for the position's existence, govern the qualification requirements, and typically occupy most of the employee's time on a regular and recurring basis, which means the duties are performed in a continuous, uninterrupted manner, or they are performed at recurring intervals with anticipated frequency.
22. **Merit System Principles.** Merit system principles are found in 5 U.S.C. § 2301. As stated in 4 CFR § 2.4(a), "Merit personnel systems are based on the principle that an organization is best served by motivated, competent, honest and productive workers. In a merit system, employees are hired, promoted, rewarded, and retained on the basis of individual ability and fitness for employment without regard to race, color, sex, religion, age, or national origin. Central to this principle is the protection of employees from discrimination, improper political influence and personal favoritism."
23. **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.
24. **Office of Personnel Management (OPM).** The OPM was 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.

25. **Pathways Programs.** Governmentwide 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.
26. **Pay Plan.** Identifies the pay system under which the position is covered. The pay plan is represented by a two-letter alphabetical code (e.g., GS for General Schedule or WG for Wage Grade, which is under the FWS).
27. **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.
28. **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.
29. **Position Classification Determination.** The decision classifying a position to a pay plan, occupational series, title, and grade in accordance with approved position classification standards.
30. **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.
31. **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 factors such as KSAs and judgment used.
32. **Position Description Cover Page (PD cover page).** The cover page attached to a PD that is used to document position requirements and determinations, as well as the organizational location of the position. The supervisor uses the PD cover page to certify the accuracy of the PD, organizational context, and authorized establishment of the position. The Classifier uses the PD cover page to certify the position classification determination of the position.
33. **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.
34. **Prohibited Personnel Practice (PPP).** Prohibited personnel practices are employment-related activities that are banned in the Federal workforce because they violate the merit system through some form of employment discrimination, retaliation, improper hiring practices, or failure to adhere to laws, rules, or regulations that directly concern the merit system principles. PPPs can be found in 5 U.S.C. § 2302(b).
35. **Realignment.** The movement of an employee and the employee’s position (e.g., an 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.
36. **Reorganization.** The planned elimination, addition, or redistribution of functions or duties in an organization.
37. **Standard Position Description (SPD).** A PD that has been classified and formally established for mandatory use throughout a designated organization (e.g., a bureau, the Department) for positions

whose primary purpose, major duties and responsibilities, as well as nature of work and other evaluative factors, are substantially the same.

38. **Supervisor or Manager (Code 2).** A supervisor position that requires the exercise of supervisory or managerial responsibilities that meet, at least, the minimum requirements for application of the GSSG or similar standards of minimum supervisory responsibility specified by position classification standards or other directives of the application pay schedule or system.
39. **Supervisor-CSRA (Code 4).** A supervisor position that meets the definition of supervisor in 5 U.S.C. 7103(a)(10) but does not meet the minimum requirements for application of the GSSG. Supervisor-CSRA (Code 4) does not apply to Senior Executive Service positions.
40. **Third-Party Review.** A neutral person, group, or organization (e.g., a contract classifier, a panel of Classifiers, or the Department) chosen by the HCO to review written submissions from the HRO when there is disagreement with a classification validation determination of the Deputy HCO. 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.

10. Appendix C. Acronym Legend

Acronym	Description
AD/DAD	Assistant Director/Deputy Assistant Director
BLR	Base Level Roster
BLS	Base Level Spreadsheet
BUS	Bargaining Unit Status (FPPS code)
CFR	Code of Federal Regulations
CSRA	Civil Service Reform Act
DOI, Department	Department of the Interior
DTS	Document Tracking System
EPAP	Employee Performance Appraisal Plan
FAIR	Federal Activities Inventory Reform
FAQ	Frequently Asked Questions
FES	Factor Evaluation System
FLERT	Firefighter and Law Enforcement Retirement Team
FLSA	Fair Labor Standards Act
FPL	Full Performance Level (associated with pay grade)
FPPS	Federal Personnel and Payroll System
FTE	Full Time Equivalent
FWS	Federal Wage System
GS	General Schedule
GSLGEG	General Schedule Leader Grade Evaluation Guide
GSSG	General Schedule Supervisory Guide (OPM classification standard)
HC-08	Human Capital-08 (Department's PD cover page)
HC, HCO	Human Capital, Human Capital Officer
HCMS	Human Capital Management System (automated system)
HR	Human Resources
HRO	Chief, Human Resources Operations
I.A.	Identical Additional
JAO	Joint Administrative Operations
KSA	Knowledge, Skills, and Abilities
MSPB	Merit Systems Protection Board
NDAA	National Defense Authorization Act
NOAC	Nature of Action Code
OCX	Organization Chart Express (part of HCMS)
OF-8	Optional Form-8 (OPM's PD cover page)
OGE	Office of Government Ethics
OPF	Official Personnel Folder
OPM	Office of Personnel Management
PB	Personnel Bulletin (HR policy issued by the Department)
PD	Position Description
PDR	Position Designation Record
PDT	Position Designation Automated Tool
PDX	Position Description Express (part of HCMS)
PMPC	Position Management and Position Classification

Acronym	Description
PPE	Personal Protective Equipment
PPP	Prohibited Personnel Practice
RD/DRD	Regional Director/Deputy Regional Director
SES	Senior Executive Service
SME	Subject Matter Expert
SPD	Standard Position Description
TDP	Testing Designated Position (substance testing)
U.S.C.	United States Code
WB	Wage Board (pay plan within FWS)
WG	Wage Grade (pay plan within FWS)
WL	Wage Leader (pay plan within FWS)
WS	Wage Supervisor (pay plan within FWS)

11. Appendix D. General Implementing Instructions for Department SPDs

Background

Department of the Interior SPDs are issued as policy with specific instructions communicated by Personnel Bulletin (PB) or Memorandum under the umbrella of PB No. 20-10, *Department of the Interior/Office of Human Capital Standard Position Descriptions*, issued August 13, 2020. The Service also has applicable policy and guidance found in 225 FW 1, *Position Management and Position Classification*, and in the associated *Position Management and Position Classification (PCPM) Handbook*. Below are general SPD implementation questions and answers for the Service. SPD-specific implementing instructions (typically addressing titling, position numbers, and internal controls) will be provided, as necessary, with each new SPD issuance. SPD-specific implementing instructions supplement the general implementing instructions below and are stored on the [JAO HR Classification SPD SharePoint](#).

Question Number	Question	Answer
1.	Is there a date for implementation?	Department SPDs are effective and required immediately for new appointments and recruitment. Otherwise, implementation for legacy positions is required no later than 60 days from the date of the SPD transmittal. FPPS actions (reassignments) must be done within this time frame. See PB No. 20-10.
2.	Does the supervisor need to certify the SPD by signing the PD cover page?	Yes. PB No. 20-10 states that “using SPDs does not diminish management’s responsibility to adhere to basic position management principles.” In OPM’s Introduction to the Position Classification Standards (online page 11) it states that the “need to achieve an economical and effective position structure is critical to the proper and responsible use of limited financial and personnel resources.” Furthermore, the requirements in PB No.18-03, <i>Position Management and Position Classification Policy and Handbook (Departmental Handbook)</i> apply to SPDs. Therefore, when using an SPD for a position, the supervisor must sign and date the PD cover page, certifying that the PD is “an accurate statement of the major duties and responsibilities of this position and its organizational relationships...” as spelled out on the PD cover page. Management officials are required to ensure equal pay for substantially equal work [5 USC § 5101].
3.	Must the HRO fill out the PD cover page for the specific position (e.g., duty station, BUS code, OGE-450, FLSA)?	Yes. When using an SPD, the items that are left blank, such as duty station, organization subdivisions, financial filer, and FLSA, must be completed for the specific position and then signed as described under Question #2. Items that are blank are purposely left blank so that determinations can be made at the local level, such as position sensitivity.
3a.	Will DOI provide FLSA Worksheets for the SPDs?	No. Completed worksheets will not be provided by the Department; however, you must complete the Department’s FLSA Designation Worksheet, as required by PB No. 21-06 (551), <i>Fair Labor Standards Act Overtime Pay Entitlement</i> .

Question Number	Question	Answer
3b.	Do we have to complete a Cybersecurity Checklist?	Yes. You will need to complete a Cybersecurity Checklist. PB No. 17-06, <i>Revised Cybersecurity Data Standard Codes Structure</i> , applies to all positions, including SPDs.
3c.	Can the title be modified?	No. <u>Variations to official titles are not authorized</u> . You may establish an organizational title if it clarifies the position's role. Prescribed organizational titles may be provided in SPD-specific implementing instructions. See Question #10a for instructions on coding titles in FPPS.
3d.	Is the Service modifying the PD number as allowed by the Department?	The HRO must use the Department PD Number for SPDs; however, bureaus may establish protocols for use of the last two characters in the number. The Deputy HCO will provide specific instruction if the Service modifies the last two characters of the number as part of SPD-specific implementing instructions.
4.	Will there be evaluation statements?	No. The Department will not provide evaluation statements, nor will the Deputy HCO. However, when value added the HRO should develop evaluation statements that provide organizational context, position management analysis, and background information regarding the SPD's use for the specific office or position; <u>evaluation statements do not need to address the classification determination of the SPD. Deputy positions must include an evaluation statement addressing the evaluative analysis supporting establishment of the deputy position</u> (see Question #9a for further information).
5.	Can SPDs be edited?	<u>SPDs may not be edited</u> . SPDs may not be edited electronically unless there are fill-in-the-blank sections within the SPDs (e.g., organizational location, percentage of time for major duties).
5a.	Do percentages of time for major duties need to be addressed?	Yes, if different than indicated in the SPD or left blank in the SPD. Address percentages of time in an evaluation statement. Percentage of time for supervisory responsibilities in supervisory SPDs may not be reduced below 25 percent.
5b.	Can position amendments be added to the SPDs?	As a general rule, amendments may not be added to SPDs. However, amendments will be addressed on a case-by-case basis. If the HRO has a need to amend the SPD, contact the Deputy HCO for discussion and determination.
5c.	Should telework statements or "other significant facts" be added to the end of the SPD?	No. The information typically found at the end of a PD can be addressed on the PD cover page or in an evaluation statement. <u>SPDs cannot be edited</u> .
5d.	Can additional requirements be added to the SPDs such as specific certifications or licenses?	Not unless there are specific regulations or policies that tie directly to the major duties of the position and prescribe the additional requirement (e.g., professional engineering registration). These must be addressed on the PD cover page. Requirements that are part of the typical evaluation process and included on the PD cover page, such as position sensitivity and

Question Number	Question	Answer
		financial statements required, must be determined and annotated on the PD cover page (see Question #3).
5e.	How do we address Code 4 supervisors? Can we amend the SPD? Do we need a waiver if we create a new PD?	If the SPD does not adequately describe the position, see Question #11. See the <i>Departmental Handbook</i> , Frequently Asked Questions and Answers, section 2.5, for further clarification. SPDs may not be amended to address Code 4 supervisors.
6.	Can the HRO create statements of differences for grades below the FPL?	No. The HRO may not create a statement of difference. There must be a fully described and certified PD for each grade level. The SPDs must be used for career ladders when available and adequate (e.g., the FPL for the HR Specialist position is SPD#DC00900 GS-12 but the employee is brought on at the GS-11 level; the employee would be placed on SPD#00800 GS-11 with a comment in the remarks block on the PD cover page). If SPDs are not available (e.g., there isn't an SPD that goes down to the grade needed such as GS-05), check to see if the Service has SPD templates on the SharePoint, or discuss with the Deputy HCO to see about establishing Service SPD templates or SPDs for the missing grade(s).
7.	May we use the SPDs to establish NDAA PDs? (PDs used to hire civilian retirees under the National Defense Authorization Act)	Yes. You may use SPDs for NDAA positions; there is no need to modify the SPD for NDAA appointments.
8.	Do the SPDs need to be submitted to the Deputy HCO for classification validation?	No. The classification validation process does not apply to the Department's SPDs. However, 225 FW 1, section 1.8.G, <i>GS-13 and higher SPDS</i> , must be applied. See Question #8a.
8a.	Will there be internal controls for the use of SPDs?	Yes. First, 225 FW 1, section 1.8.G, <i>GS-13 and higher SPDS</i> , applies to all SPDs. Second, other internal control procedures specific to the SPD batch may apply and will be provided in SPD-specific implementing instructions.
9.	What is the standard of adequacy in order to consider the SPD accurate?	The SPD must be 80 percent accurate in order to be adequate for use as a PD. See <i>Departmental Handbook</i> , section 2.6, "Standards of Adequacy."
9a.	Do we use these SPDs for deputy positions?	In some situations, for full deputy positions as defined in the GSSG, the SPDs may be used when the manager (for which the position is a deputy) is either on an SPD or, if in executive service, in the same series (e.g., 0340). When applying the GSSG, the deputy is set one grade lower than the grade of the position to which it reports (GSSG page 9); use the supervisory SPD that

Question Number	Question	Answer
		correlates with the grade level of the deputy. The position must meet the definition of “Deputy” in the GSSG (page 6) with evaluative analysis provided in an evaluation statement (see Question #4) supporting the deputy determination. The organizational title may reflect the deputy role (see Question #3c).
9b.	Can SPDs be used for interdisciplinary positions?	No. SPDs may not be used for interdisciplinary positions. Interdisciplinary positions are excepted from SPDs.
10.	How are we generally going to code these actions?	When “reassigning” an employee from their current PD to the new SPD, the best fit is Reassignment; NOAC 721; Rule 8 on Table 14-D, Reassignments in the Competitive Service; Authority Code N7M; Result of position Review (Chapter 14).
10a.	Is there a specific title in FPPS for these SPDs?	Yes. The title codes for the FPPS title codes will be provided in the SPD-specific implementing instructions.
11.	What is the procedure for requesting an exception to the Department policy (i.e., use of SPD)?	See PB No. 20-10, section 3, Policy, “Requests for Exceptions,” for Department policy and procedures. See 225 FW 1, section 1.15, for the Service policy and procedures, as well as section 4.4 of this handbook.
12.	Where are SPDs stored?	Department SPDs are loaded into USA Staffing and are also located on the Office of Human Capital webpage for Classification. SPDs are also loaded and stored on PDX and in the JAO HR Classification SPD SharePoint. See section 4 of this handbook.
13.	How do we address situations in which the major duties, factors, and organizational relationships are accurate, but the grade is different than the grade of the employee?	If positions are classified correctly, implementation of SPDs should be grade neutral with “minimal impact.” However, it is possible that positions were previously misclassified. The HRO will address these situations on a case-by-case basis by consulting with the Deputy HCO. It is important to not perpetuate misclassification by assigning an SPD to a position incorrectly. As stated in Question #2, management officials are required to ensure equal pay for substantially equal work [5 USC § 5101].

12. Appendix E. Instructions for Calculating Base Level

Background

Highest qualifying level of basic nonsupervisory work directed, otherwise known as base level, is a term used in the GSSG for evaluating 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. The steps for calculating base level are detailed in the table below. There are references to the Base Level Roster (BLR) and Base Level Spreadsheet (BLS). These documents are posted on the [JAO HR Classification SharePoint](#). The final BLR and BLS must be attached to the position evaluation statement.

Note: Use the BLR and BLS to calculate base level of work led when applying the General Schedule Leader Grade Evaluation Guide (GSLGEG) but follow GSLGEG instructions for what is included and excluded when calculating GSLGEG base level. Attach final BLR and BLS to the position evaluation statement.

Steps for Calculating GSSG Base Level

Steps	Standard and OPM Guidance	Application
1. Ensure Proper GSSG Coverage	To be covered by the GSSG, the position must perform supervisory work and related managerial responsibilities that: (Apply Steps 1.a and 1.b below)	Using the BLR, create an organization roster that lists all positions supervised by the supervisory position being evaluated (BLR Column A). 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 BLR Column L to track the number of employees by 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).
1.a. Technical & Administrative Direction	1.a. Supervisory responsibilities: “Require accomplishment of work through combined technical and administrative direction of others.” This means <u>supervision of people</u> , not programs or projects. The supervision of people <u>must meet at least FL 3-2</u> in the GSSG to be credited for coverage under the GSSG. If there is a paramount requirement of knowledge or experience in <u>trades and crafts</u> , use <u>FWS Job Grading Standard for Supervisors</u> – not the GSSG. <u>Positions that ONLY supervise private sector contractors are NOT covered by the GSSG.</u> For further guidance/reference see OPM appeal decisions (C-) or digests (No.) : C-1801-11-05	Identify and annotate the positions on the BLR Column A that do not meet this requirement; use BLR Column F to document Step 1.a.

Steps	Standard and OPM Guidance	Application
	(counting vacant positions and addressing weak supervisory ratio); No. 15-05 (Non-professional supervising professional); No. 32-04 and No. 32-05 (crediting volunteer and contractor work).	
Step 1.b. Supervising 25 percent of the time	1.b. Supervisory responsibilities as described in Factor 3 must: “Constitute a major duty occupying at least 25 percent of the position’s time.” It is generally considered <u>poor position management to design a supervisor position that supervises the minimum amount of time (25 percent).</u> Furthermore, the <u>Departmental 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. When factoring nonpermanent work (term or temporary) into the percentage for coverage, this work must be considered in the base level evaluation</u> (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).	How much of the position’s time (percentage) is spent performing the requirement above (1.a)? Annotate percentage on the BLS Cell F27 and the BLR Cell B3. This percentage should also be annotated on the PD for Factor 3.
Step 1.c. Supervisory Ratio	1.c. What is the supervisory ratio? How many subordinate supervisors does the position supervise?	<p>First Level Supervision (Direct): Annotate number of employees directly supervised on BLS Cell B29 and on BLR Cell C3.</p> <p>Second Level or Higher Supervision (Indirect): Annotate number of employees indirectly supervised on BLS Cell B30 and on BLR Cell D3.</p> <p>Annotate number of subordinate supervisors, including Code 4, on BLS Cell E31 and BLR Cell E3.</p>
Step 2. Determining positions for	Highest grade of basic, mission-oriented, nonsupervisory work performed that constitutes 25 percent or more of the workload of the organization. Exclude the	Ensure the BLR from Step 1 lists the FPL grades of the positions. Use FPL when calculating base level.

Steps	Standard and OPM Guidance	Application
base level calculation	following from the workload calculation: (Apply Steps 2.a-d below)	
Step 2.a. Support Work	2.a. Exclude: “The work of <u>lower-level positions that primarily support or facilitate the basic work</u> of the unit.” For further guidance/reference: C-0301-13-03 (walk through of exclusions)	Determine the workload to be excluded due to 2.a. Annotate this adjustment on BLR Column G. Provide clarifying explanation if necessary.
Step 2.b. GSSG and GSLGEG	2.b. Exclude: “ <u>Any subordinate work that is graded based on criteria in the GSSG or the Work Leader Grade-Evaluation Guide.</u> ” 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)	Determine the workload to be excluded due to 2.b. Determine the percentage and grade level(s) of the remaining workload. Annotate this adjustment on BLR Column H. Provide clarifying explanation if necessary.
Step 2.c. Independence from Supervision	2.c. Exclude: “ <u>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.</u> ” No. 10-03 (“Thus, <u>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.</u> ”) Digest No. 21, page 4 (“ <u>GS-14 positions could not be used for base level purposes.</u> ” “It (GSSG) does, however, permit <u>adjusting the grades of such work for purposes of applying the guide to those appropriate for performance under ‘normal’ supervision.</u> ”) (In addition, notes from OPM training indicate that you may figure the grade based on normal supervision and credit appropriate workload at this grade.)	Determine the workload to be excluded due to 2.c. Determine any other adjustments and provide clarifying explanation if necessary. Annotate this adjustment on BLR Column I.
Step 2.d. Not Supervising	2.d. Exclude: “Work for which the supervisor or a subordinate does not have the responsibilities defined under Factor 3.”	This should have been addressed under Step 1.a.
Step 3. Ensure GS grade equivalent for	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.	Determine GS equivalent for positions. Annotate on BLR Column J. Once this is done, complete BLR Columns K and L.

Steps	Standard and OPM Guidance	Application
remaining Non-GS positions	20-06 (credited WG-10 Electrician work as similar to GS-07 Technician work); No. 31.09 (contractor equivalent). General guidance: 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 or 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 mechanics could be GS-9/10; and expert level such as 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).	
Step 4. Calculating Base Level	There are three methods for calculating base level; see below.	Use the BLS to calculate. Document the method used in BLS Cell I32.
Step 4. Calculating Base Level - Method 1	Method 1: For smaller organizations, determine grade levels and associated percentages specific to each position supervised based on individual analysis of each position.	Referencing BLR Columns K and L, 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.
Step 4. Calculating Base Level - Method 2	Method 2: For larger organizations, enter a prescribed distribution of grade levels and associated percentages for all positions supervised. The prescribed distribution is 10/70/20. In other words, 10 percent above grade, 70 percent at grade, and 20 percent below grade.	Referencing BLR Columns K and L, enter the FTE numbers by grade on the BLS Row 25. For Method 2, the prescribed distribution has been pre-populated on the BLS.
Step 4. Calculating Base Level - Method 3	Method 3: For second level supervisors who supervise more than 50 percent of the time and spend at least 50 percent of the 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	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

Steps	Standard and OPM Guidance	Application
	<p>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 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.</p>	<p>explanation for using Method 3. Provide explanation in BLS Cell I32.</p>
<p>Step 5. Base Level Determination</p>	<p>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.</p>	<p>Once data is entered in the BLS from Step 4 using 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 (BLS Colum T). Use the BLS to calculate and document this analysis.</p>

13. Appendix F. State Driver's License Requirement Determination

A. Determination Criteria

Based on review of related Merit Systems Protection Board decisions, threshold questions to answer when determining whether a state driver's license is required of the position are:

1. How much of the work time requires driving? (This should be around 50 percent or more.)
 - a. What major duties directly require driving a motor vehicle? What percentage of the position's time is spent performing those major duties?
2. How much of the required driving is done independently (i.e., without other drivers in the car)? (Should be most of the time.)
3. How many other employees can drive and do this work? (For example, is only one employee assigned to the area, or are eight other employees available to do the same work?)
4. Would you have to separate the employee from this position if they could not drive or lost their driver's license? Explain both yes and no answers.

A driver's license is a requirement of the job if:

1. The position requires driving a majority of the time (supported by the major duties in the PD),
2. Most of the driving is done independently,
3. There are few employees that do this type of work, and
4. You would have to replace the employee if they lost their driver's license.

B. Documentation of Requirement

1. Supervisors must provide written responses to these questions as justification for establishing a driver's license requirement. Supervisors must also provide a written description of their internal control(s) to ensure that the employee maintains their driver's license.
 - a. The supervisor provides this information to the Classifier either in an email using [mySupport](#) or in a signed and dated document.
2. The Classifier will attach the email or document to the comprehensive evaluation statement which will be filed with the PD record.
 - a. Additionally, the Classifier will document the requirement as described in [section 6.C\(10\)](#) of this handbook.