

U.S. Office of Personnel Management  
Office of Merit Systems Oversight and Effectiveness  
Classification Appeal and FLSA Programs

San Francisco Oversight Division  
120 Howard Street, Room 760  
San Francisco, CA 94105-0001

**Classification Appeal Decision**  
**Under section 5112 of title 5, United States Code**

**Appellant:** [The appellant]

**Agency classification:** Supervisory Detention and Deportation  
Officer  
GS-1801-13

**Organization:** [Appellant's organization/location]  
Immigration and Naturalization Service  
U.S. Department of Justice

**OPM decision:** GS-1801-13; title at the agency's  
discretion

**OPM decision number:** C-1801-13-02

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Carlos A. Torrico  
Classification Appeals Officer

July 8, 2002  
Date

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the government. The agency is responsible for reviewing its classification decisions for identical, similar, or related positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under conditions and time limits specified in the *Introduction to the Position Classification Standards*, appendix 4, section G (address provided in appendix 4, section H).

**Decision sent to:**

**Appellant:**

[Appellant's address]

**Agency:**

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## **Introduction**

On January 17, 2002, the San Francisco Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [the appellant]. On February 28, 2002, the Division received the agency's administrative report concerning the appeal. The appellant's position is classified as Supervisory Detention and Deportation Officer, GS-1801-13. However, he believes the position should be graded at the GS-14 level. The appellant works in the [appellant's organization/location] Immigration and Naturalization Service (INS), U.S. Department of Justice. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

## **General issues**

This decision is based on a thorough review of all information provided by the appellant and his agency. In addition, separate telephone interviews were conducted with the appellant and his supervisor, the District Director. Both the appellant and his supervisor have certified to the accuracy of the appellant's official position description (PD) [number]. However, the appellant and agency note that the correct title of the subordinate supervisory GS-13 position is Supervisory Deportation Officer rather than Supervisory Detention and Deportation Officer. The appellant compares his position to his organizational counterparts in other district offices that are higher graded. By law, we must classify positions solely by comparing their current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's position to others as a basis for deciding his appeal.

Like OPM, the appellant's agency must classify positions based on comparison to OPM standards and guidelines. However, the agency also has primary responsibility for ensuring that its positions are classified consistently with OPM appeal decisions. If the appellant considers his position so similar to others that they all warrant the same classification, he may pursue the matter by writing to his personnel office. In doing so, he should specify the precise organizational location, classification, duties, and responsibilities of the positions in question. If the positions are found to be basically the same as his, the agency must correct their classification to be consistent with this appeal decision. Otherwise, the agency should explain to him the differences between his position and the others.

The appellant indicated that his position might be affected by the upcoming restructuring of the detention and removal operations field structure. As mentioned above, we must classify positions based on their current duties and responsibilities. We cannot consider prospective changes in classifying the appellant's position.

## **Position information**

The official position description reflects that the appellant serves as the Assistant District Director for Detention and Removal Operations (ADD/DRO) for the [name of appellant's office]. The position is responsible for the overall management and operation of the Detention and Removal Program. The district includes the [name of state] and outlying areas, including

operations on the high seas. The appellant is responsible for ensuring the enforcement of laws and regulations pertaining to the detention and removal, exclusion, or voluntary departure of aliens illegally in the United States. He reports directly to the Deputy District Director for policy direction and resolution of the most complex problems.

The staff and budget have increased substantially since 1996 when the appellant came on board as the ADD/DRO. The budget has increased from \$60,000 to \$1.25 million and the staff has increased from 3 to 11. The appellant provides technical and administrative supervision to one Supervisory Deportation Officer, GS-1801-13; three Deportation Officers, GS-1801-12; four Detention Enforcement Officers, GS-1802-7; one Program Analyst, GS-343-9; one Deportation Assistant, GS-1802-7; and a Deportation Clerk, GS-1802-5. The appellant initiates requests and briefs regional officials justifying proposed staff increases including numbers and types of positions. In 2001, the appellant was able to add three positions: the subordinate supervisor, a program analyst, and a clerk.

The results of our interviews, the appellant's PD, and other material of record furnish more information about his duties and responsibilities and how they are performed.

### **Series, title, and standard determination**

The agency has assigned the appellant's position to the General Inspection, Investigation, and Compliance Series, GS-1801, and the appellant does not disagree. We concur with the agency's series determination. Similar to the appellant's position, and as stated in the GS-1801 standard (dated October 1980), that series includes positions whose primary duties are to administer, coordinate, supervise, or perform inspection, investigative, analytical, or advisory work to assure understanding and compliance with Federal laws, regulations, or other mandatory guidelines when such work is not covered by a more specialized series. The detention and removal function ensures compliance with immigration laws by detaining and deporting persons who violate those laws. The work does not meet the definition of any more appropriate series.

OPM has prescribed no titles for positions in the GS-1801 series. Therefore, according to section III.H.2 of the Introduction to the Position Classification Standards, the appellant's agency may choose the official title for his position. In doing so, the agency should follow the titling guidance in that section, particularly as it concerns the use of the word "Officer" to denote supervisory responsibility.

The standard for the General Inspection, Investigation, and Compliance Series, GS-1801, does not include grade-level criteria. It does provide that supervisory positions be evaluated using the General Schedule Supervisory Guide (GSSG), dated April 1998 (reissued in HRCD-7, July 1999). Because the appellant spends all of his work time performing supervisory work and related managerial responsibilities, and the position fully meets the basic coverage requirements of the GSSG for evaluation as a supervisor, we have applied that guide to determine the grade level of his position.

## Grade determination

The GSSG provides evaluation criteria for determining the grade level of supervisory positions in grades GS-5 through GS-15. This guide uses a factor-point method that assesses six factors: (1) Program Scope and Effect, (2) Organizational Setting, (3) Supervisory and Managerial Authority Exercised, (4) Personal Contacts, (5) Difficulty of Typical Work Directed, and (6) Other Conditions.

### *Factor 1 - Program Scope and Effect*

This factor assesses the general complexity, breadth, and impact of the program areas and work directed, including its organizational and geographic coverage. It also assesses the impact of the work both within and outside the immediate organization. To assign a factor level, the criteria dealing with both scope and effect, as defined below, must be met.

#### *Scope*

Scope addresses the general complexity and breadth of the program directed and the work directed, the products produced, or the services delivered. The geographic and organizational coverage of the program within the agency structure is included under scope. The agency found that the program segment directed by the appellant exceeded Level 1-2, but failed to meet Level 1-3 and the appellant disagrees.

At Level 1-2a the program segment or work directed is administrative, technical, complex clerical, or comparable in nature. The functions, activities, or services provided have limited geographic coverage and support most of the activities comprising a typical agency field office, an area office, a small to medium military installation, or comparable activities within agency program segments.

Level 1-3a discusses directing a program segment that performs technical, administrative, protective, investigative, or professional work. The program segment and the work directed typically have coverage which encompasses 1) a major metropolitan area, a State, or a small region of several States; **or**, 2) when most of an area's taxpayers or businesses are covered, coverage comparable to a small city. A third situation that falls at this level involves providing complex administrative or technical or professional services directly affecting a large or complex multimission military installation.

The Detention and Removal program segment directed by the appellant involves administrative and protective work as discussed at the 1-3a level. However, the agency assigned Level 1-2a because it found that the "... ADD is responsible for directing detention and removal work for a district that has limited geographic coverage of an area's taxpayers/businesses to be affected economically by an influx of aliens illegally entering the area. This coverage fails to fully meet *Scope* at Level 1-3."

Level 1-3a includes a criterion for evaluating work which encompasses, when most of an area's taxpayers or businesses are covered, coverage comparable to a small city. It is inappropriate to

compare the appellant's work to this criterion. The DRO work directly supports the INS [name of appellant's district office] mission by detaining and removing illegal aliens generally identified by the District's Investigations and Examination branches or another agency such as the U.S. Coast Guard. The DRO work does not involve providing services directly to taxpayers and businesses like an Internal Revenue Service office. In more general terms, the DRO work serves the public welfare by removing illegal aliens, but it does not involve providing services directly to taxpayers or businesses.

The appellant directs a program segment covering [state] and outlying areas, including operations on the high seas. On the surface, this would appear to meet Level 1-3a as [state] is a large State, [size of state]. However, the scope element is not measuring geographic size alone, but the volume of work generated which is why areas of such disparate size as a major metropolitan area, a State, or a small region of several States are considered equivalent.

The appellant provided statistics showing the increase in the [name of district] DRO's workload from 1987 through 2001, e.g., the number of detained aliens increased from 171 in 1988 to 322 in 2001. The statistics provided also show that in 2001 the [name of district] DRO had 81 detained alien removals and 262 detained alien transports. Statistics posted on the INS web site show that as of October 1996, INS estimated that about 4.7 million illegal immigrants resided in twenty states (e.g., 2 million in California) and 330,000 resided in the other 30 states which included [the appellant's state]. INS statistics for Fiscal Years 1992 – 2000 reflect that the [name of district] ranked near the bottom of all INS districts in the number of deportable aliens (about an average of 350 per year). At the high end, the Los Angeles District had about an average of 10,000 deportable aliens per year. INS statistics for Fiscal Year 2000 show the [name of district] ranked near the bottom of all INS districts in terms of aliens expelled (i.e., 89 formal removals and 83 voluntary departures). The Los Angeles district, had 8,989 formal removals and 3,709 voluntary departures. Overall, these statistics reflect that [state] economy and businesses have not yet attracted large numbers of illegal aliens. Although the work directed encompasses the [name of state], the scope of the work is not as broad or complex as envisioned at Level 1-3a.

We recognize that the appellant is faced with logistical problems related to housing and transporting illegal aliens. For example, the [name of state] has a court ordered cap on the number of prisoners in its facilities and, when the State facilities are full, the appellant arranges housing in hotels with private guards posted. In another example, should the U.S. Coast Guard interdict a foreign fishing vessel and bring it in at [name of port], the appellant is responsible for arranging housing in [port] as necessary, air transport for the crew to [city], housing in State or local prisons or in hotel rooms with private guards posted, and transporting them to [city] for removal, if necessary. However, in our judgment, the logistical problems do not counterbalance the lower work volume to a degree sufficient to credit 1-3a.

Level 1-2a is credited for scope.

### *Effect*

Effect addresses the impact of the work, the products, and/or the programs described under scope on the mission and programs of the customer, the activity, other activities in or out of government, the agency, other agencies, the general public, or others.

At Level 1-2b, the services or products support and significantly affect installation level, area office level, or field office operations and objectives, or comparable program segments; or provide services to a moderate local or limited populations of clients or users comparable to a major portion of a small city or rural county.

At Level 1-3b, the activities, functions, or services accomplished directly and significantly impact a wide range of agency activities, the work of other agencies, or the operations of outside interests (e.g., a segment of a regulated industry), or the general public. At the field activity level (involving large, complex, multimission organizations and/or very large serviced populations), the work directly involves or substantially impacts the provision of essential support operations to numerous, varied, and complex technical, professional, and administrative functions.

The agency assigned Level 1-2b because the appellant's work impacts the functions of other agencies and the general public to a limited extent. The appellant believes that the work he directs has a significant impact on a wide range of agency activities, functions of other agencies, and the operations of a regulated industry.

The detention and deportation activities support the [name of district] programs in enforcement of immigration laws, which is comparable to Level 1-2b. The [city] District DRO program does not directly and significantly impact a wide range of Department of Justice activities, as discussed at Level 1-3b.

The appellant works with the U.S. Marshals Service, the U.S. Coast Guard, as well as local law enforcement governmental agencies, to coordinate detention and deportation of criminal aliens. However, such coordination does not have a direct and significant impact on the work of these agencies as envisioned at Level 1-3b given the relatively low numbers of deportable aliens.

The appellant indicates annual work site and educational operations reduced the number of illegal aliens hired by the fishing and fish processing industry particularly in [names of ports]. INS statistics for 1992 – 2000 show that the [city] District had a high of 520 deportable aliens in 1994 and a low of 293 in 1998 with an average of about 350 per year during this period. The relatively low numbers are not reflective of a program that directly and significantly impacts the operations of outside interests as discussed at Level 1-3b.

The last criterion under Level 1-3b does not apply as the DRO program does not involve the provision of essential support operations to large, complex, multimission organizations or very large serviced populations.

Level 1-2b is credited for effect.

As both subfactors under Factor 1 are credited at Level 1-2, that level is credited and 350 points are assigned.

### *Factor 2 - Organizational Setting*

This factor considers the organizational situation of the position in relation to higher levels of management.

Level 2-2 is credited when a position is accountable to a position that is one reporting level below the first Senior Executive Service (SES) position in the supervisory chain. The appellant's ADD position reports to the Deputy District Director, who is a full deputy to the District Director. In such cases, instructions in the GSSG provide that the appellant should be credited with reporting to the District Director. The District Director reports to the Regional Director who occupies the first SES position in the supervisory chain.

Level 2-2 is credited for 250 points.

### *Factor 3 - Supervisory and Managerial Authority Exercised*

This factor covers the delegated supervisory and managerial authorities which are exercised on a recurring basis. To be credited with a level under this factor, a position must meet the authorities and responsibilities to the extent described for the specific level. Where authority is duplicated or not significantly differentiated among several organizational levels, a factor level may apply to positions at more than one organizational level.

The appellant supervises eleven employees including one Supervisory Deportation Officer, GS-1801-13, who spends 25 percent of his time on GS-13 supervisory duties and 75 percent on nonsupervisory GS-12 deportation officer duties; three Deportation Officers, GS-1801-12; four Detention Enforcement Officers, GS-1802-07; one Program Analyst, GS-0343-09; one Deportation Assistant, GS-1802-07; and one Deportation Docket Clerk, GS-1802-05.

Level 3-2 defines the basic requirements for coverage by the GSSG. Level 3-2 requires that the position must meet one of the paragraphs: a, b, or c. Paragraph a discusses production-oriented work and b describes situations where work is contracted out. Neither is appropriate for this position. At Level 3-2c, the position must have responsibility for carrying out at least three of the first four and a total of six or more of 10 authorities and responsibilities. The appellant's position fully meets the criteria for Level 3-2c.

To be credited at Factor Level 3-3, paragraph a or b must be met.

Level 3-3a describes positions exercising delegated managerial authority to set a series of long-range work plans and schedules, assuring implementation of goals and objectives by subordinate organizations. They determine goals and objectives that need additional emphasis, determine the best approach for resolving budget shortages, and plan for long-range staffing needs. The positions are closely involved with high-level program officials in development of overall goals

and objectives for assigned functions or programs. For example, they direct development of data, provision of expertise and insights, securing of legal opinions, preparation of position papers or legislative proposals, and execution of comparable activities that support development of goals and objectives of high levels of program management and development or formulation. In the subject position, the managerial authority for determining overall goals and objectives and long-range planning is located at a higher level in the agency. Level 3-3a is not appropriate for this position.

Level 3-3b may be credited when the position exercises all or nearly all of the delegated supervisory authorities and responsibilities described at Level 3-2c and, in addition, at least 8 of the 15 responsibilities discussed under Level 3-3b.

The agency has determined that at least six supervisory authorities under Level 3-3b are creditable, i.e., 2, 4, 9, 13, 14, and 15. The appellant believes that supervisory authorities 1, 5, 6, 8, and 11 should also be credited. We find that only authorities 2, 13, 14, and 15 of Level 3-3b are creditable.

Level 3-3b envisions the delegation of greater and more diverse supervisory authorities than used at Level 3-2c to supervise a substantially greater workload, requiring use of multiple subordinate supervisors (plural), team leaders, group leaders, etc., to help the supervisor direct and coordinate the work of the organization. There is only one subordinate supervisor (no leaders, coordinators or comparable personnel) so we cannot credit Level 3-3b supervisory authorities 1, 3, 5, 6, and 8 which require that there be multiple subordinate supervisors, team leaders, group leaders, etc., to help manage the larger workload. Four of the five authorities the appellant believes are met (i.e., 1, 5, 6, and 8) are not creditable.

We also found that we could not credit authorities 4, 7, 9, 10, 11, and 12. Although the current annual budget is 1.25 million, it is not a *multimillion* dollar level budget (i.e., at least \$2 million or more) as discussed in authority 4. The appellant's position description states that the position can recommend selections, but the position does not have the authority to make or approve selections for nonsupervisory subordinates (authority 7) as discussed at the Level 3-3b. The position description reflects and the appellant indicates that he hears complaints and resolves them informally. These have not involved serious employee complaints or group grievances (authority 9). The appellant indicated that he could recommend serious disciplinary actions (e.g., suspensions) for nonsupervisory subordinates, but the District Director would be the reviewing and approving official (authority 10). The appellant indicates that he approves job-related training, but it has not involved nonroutine, costly, or controversial training (authority 11). Authority 12 regarding reviewing contractor performed work does not apply to the appellant's position and is not creditable.

We credit authorities 2, 13, 14, and 15. The appellant's position meets authority 2 because he has significant responsibilities in dealing with officials in coordinating detention and removal of illegal aliens. The appellant's position exercises authority 13 as his position is authorized to approve within-grade increases, extensive overtime (\$30,000 cap per employee), and employee travel. His position is responsible for recommending awards and changes in classification

comparable to authority 14. Similar to authority 15 the appellant finds ways to eliminate significant barriers to accomplishing work, and promotes team building in his office.

We credit four authorities under Level 3-3b: 2, 13, 14, and 15. This falls short of the eight responsibilities or authorities needed to credit Level 3-3b. Therefore, Factor Level 3-2 is assigned and 450 points are credited.

#### *Factor 4 - Personal Contacts*

This is a two-part factor which assesses the nature and purpose of personal contacts related to supervisory and managerial responsibilities. The agency evaluated the subfactors at Level 4A-2 and 4B-2 and the appellant agreed.

##### *Subfactor 4A - Nature of Contacts*

This subfactor covers the organizational relationships, authority, or influence level, setting, and difficulty of preparation associated with making personal contacts involved in supervisory and managerial work. To be credited, the level of contacts must contribute to the successful performance of the work, be a recurring requirement, have a demonstrable impact on the difficulty and responsibility of the position, and require direct contact.

At Level 4A-2 there are frequent contacts with higher ranking managers, supervisors, and staff of program, administrative, and other work units throughout the field activity; representatives of local public interest groups; case workers in congressional district offices; or technical or operating level employees of State and local governments. These contacts may be informal, occur in conferences and meetings, or through telephone, televised, radio, or similar contact, and sometimes require special preparation.

Level 4A-3 describes frequent contacts with high ranking military or civilian managers, supervisors, and technical staff at bureau and major organizational levels of the agency; with agency headquarters administrative support staff; or with comparable personnel in other Federal agencies; congressional committee and subcommittee staff assistants below staff director or chief counsel levels; etc. Contacts include those which take place in meetings and conferences and unplanned contacts for which the employee is designated as a contact point by higher management. They often require extensive preparation of briefing materials or up-to-date technical familiarity with complex subject matter.

The appellant's contacts are comparable to Level 4A-2 as he is relied upon to establish and maintain liaison and close personal contacts with responsible local, state and Federal government officials as well as with foreign consular representatives and to deal effectively with attorneys and organizations representing aliens in order to expedite actions in removal cases. The appellant's position does not require frequent contacts with high ranking officials that require extensive preparation as described at Level 4A-3

This subfactor is evaluated at Level 4A-2 and 50 points are credited.

#### *Subfactor 4B - Purpose of contacts*

This subfactor covers the purpose of the personal contacts credited in 4A, including the advisory, representational, negotiating, and commitment making responsibilities related to supervision and management.

Level 4B-2 indicates the purpose of contacts is to ensure that information provided is accurate and consistent; to plan and coordinate the work directed with that of others outside the subordinate organization; and/or to resolve differences of opinion among managers, supervisors, employees, contractors, or others.

Level 4B-3 states the purpose of contacts is to justify, defend, or negotiate in representing the organizational unit directed; in obtaining or committing resources; **and** in gaining compliance with established policies, regulations, or contracts. At this level, contacts usually involve active participation in conferences, meetings, hearings, or presentations involving problems or issues of considerable consequence or importance to the program managed.

The purpose of the appellant's contacts is most comparable to Level 4B-2 as he plans and coordinates with others outside the DRO branch to place juveniles in foster homes, transport aliens to and from jail facilities, and present aliens to various foreign consulates for interviews. His contacts do not involve justifying, defending, or negotiating on issues of considerable importance to the DRO program as discussed at Level 4B-3.

This subfactor is evaluated at Level 4B-2 and 75 points are credited.

#### *Factor 5 - Difficulty of Typical Work Directed*

This factor measures the difficulty and complexity of the basic work most typical of the organization directed, as well as other line, staff, or contracted work for which the supervisor has technical or oversight responsibility, either directly or through subordinate supervisors, team leaders, or others. This work must characterize the nature of the basic (mission oriented) nonsupervisory work performed and constitute 25 percent or more of the workload (not positions or employees) of the organization. The instructions indicate that trainee level positions are credited at the full performance level. Work of lower level positions that primarily support or facilitate the basic work of the unit, subordinate work that is graded based on supervisory or work leader duties or an extraordinary degree of independence from supervision, or work for which the supervisor does not have responsibilities defined under Factor 3 should be excluded. The agency evaluated the base level at GS-12 and the appellant agrees. For purposes of this decision we are accepting the agency's classification of the subordinate positions.

The information in the appeal record indicates there are eleven authorized positions under the supervisory direction of the appellant: one Supervisory Deportation Officer, GS-1801-13, who spends 25 percent of the time performing GS-13 level supervisory duties, and 75 percent on nonsupervisory GS-12 deportation officer duties; three Deportation Officers, GS-1801-12; four Detention Enforcement Officers, GS-1802-07; one Program Analyst, GS-0343-09; one Deportation Assistant, GS-1802-07; and one Deportation Docket Clerk, GS-1802-05.

Removing the subordinate supervisory and lower level assistant and clerical support work leaves approximately 8.75 staff years of nonsupervisory, substantive work to support the mission. The GS-12 work represents about 43 percent of the work directed and it is the highest level of nonsupervisory work performed under the appellant's direction.

The base level work for the position is GS-12. Using the conversion chart in the GSSG for Factor 5, that base level equates to Level 5-7 and 930 points are credited.

#### *Factor 6 - Other Conditions*

This factor measures the extent to which various conditions contribute to the difficulty and complexity of carrying out supervisory duties, authorities, and responsibilities. Conditions affecting work for which the supervisor is responsible may be considered if they increase the difficulty of carrying out assigned supervisory or managerial duties and authorities. To apply this factor, the highest factor level definition that the position fully meets may be credited. The agency credited Level 6-4 but the appellant believes that his position meets Level 6-6.

Supervision and oversight at Level 6-6a requires exceptional coordination and integration of a number of very important and complex program segments or programs of managerial or administrative work comparable to the GS-13 or higher level. The appellant does not direct a number of program segments or programs equivalent to GS-13 or higher level work. As used in the GSSG, a program is concerned with the mission of an agency (i.e., the Department of Justice) or comparable agencywide line or staff programs essential to the operation of an agency. Programs have broad objectives such as law enforcement or national defense. A program segment refers to any subdivision of a program. The appellant's position supervises a small program segment, i.e., [appellant's unit] in a district office, a portion of the INS enforcement mission, which is a program segment of the overall Department of Justice mission. Level 6-6a is not creditable.

Level 6-6b is not appropriate as it requires managing work through multiple supervisors who each direct substantial workloads comparable to the GS-12 level.

Supervision and oversight at Level 6-5a requires significant and extensive coordination and integration of a number of important projects or program segments of managerial or administrative work comparable in difficulty to the GS-12 level. The appellant does not direct a number of program segments as discussed under Level 6-6a above. Although the position has a GS-12 base level, he also does not manage a number of important projects as discussed at Level 6-5a, and does not make major recommendations in those areas listed. Since 1996, his most significant project has been to seek approval to convert an existing building on the district's property into a 25-bed detention facility to help alleviate problems with housing detainees in State facilities and renting hotel rooms and posting private guards. Headquarters has approved the proposal, but most recently suspended the project until next year pending funding and building approval from city officials. This summer he will develop contingency plans with appropriate authorities in [outlying areas] in anticipation of the detention and removal of foreign fishing vessel crews in these areas. Detaining and removing a crew may occur once or up to 5 or

6 times during the summer. This project is not sufficient in breadth or depth to meet the Level 6-5a criteria. Level 6-5a is not creditable.

Level 6-5b is not appropriate for the appellant's position. His work does not involve direct supervision of nonsupervisory work at the GS-13 or higher grade levels.

Level 6-5c is not appropriate as it requires managing work through multiple supervisors who each direct substantial workloads comparable to the GS-11 level.

At Level 6-4a, supervision requires substantial coordination and integration of a number of major work assignments, projects, or program segments of professional, scientific, technical, or administrative work comparable in difficulty to the GS-11 level. Although the base level identified under Factor 5 is at the GS-12 grade level, the additional complexities of directing the district's DRO work are comparable to the first and fifth examples under Level 6-4a. The appellant is responsible for managing the DRO branch in its entirety including integrating internal and external DRO technical, financial, organizational, and administrative issues as they affect the branch. The appellant, through his subordinate supervisor, is also responsible for ensuring the substance of reports, decisions, case documents, or other action documents accurately reflect the policies and position of the organization and the views of the agency.

Level 6-4b is not appropriate as it requires that the position direct multiple subordinate supervisors and/or contractors who each direct substantial workloads comparable to the GS-9 or 10 level.

This factor is evaluated at Level 6-4 and 1120 points are credited.

### *Summary*

By application of the GSSG, we have evaluated the appellant's supervisory duties as follows:

<b>Factor</b>	<b>Level</b>	<b>Points</b>
1. Program Scope and Effect	1-2	350
2. Organizational Setting	2-2	250
3. Supervisory & Managerial Authority Exercised	3-2	450
4. Personal Contacts		
4A Nature of Contacts	4A-2	50
4B Purpose of Contacts	4B-2	75
5. Difficulty of Typical Work Directed	5-7	930
6. Other Conditions	6-4	<u>1120</u>
	Total:	3225

A total of 3225 points falls into the GS-13 range (3155-3600) by reference to the point-to-grade conversion chart in the GSSG. Therefore, the appellant's supervisory duties are graded at the GS-13 level.

**Decision**

The appellant's position is properly classified in the GS-1801 series at the GS-13 grade level. Selection of an appropriate title is at the agency's discretion.