

U. S. Army Corps of Engineers Position Classification Guidance Evaluation of MSC Level Supervisory & Managerial Positions

1. References:

- a. USOPM Introduction to the Position Classification Standards, dtd Jul 95.
- b. USOPM PCS GSSG, APR 93.
- c. DEPARTMENT OF DEFENSE (DOD) SUPPLEMENTARY GUIDANCE FOR THE GENERAL SCHEDULE SUPERVISORY GUIDE (GSSG), JUN 93.
- d. DEPARTMENT OF ARMY IMPLEMENTING INSTRUCTIONS FOR THE GENERAL SCHEDULE SUPERVISORY GUIDE (GSSG), 30 JUN 93.
- e. U. S. ARMY CORPS OF ENGINEERS IMPLEMENTING INSTRUCTIONS FOR THE GENERAL SCHEDULE SUPERVISORY GUIDE (GSSG), 10 AUG 95.
- f. USOPM Central Office Appeal Decision - Reconsideration of Dallas Region Decisions on New Orleans District Human Resources Office positions, dated 11 Mar 94 (summarized in U.S. OPM Digest of Significant Classification Decisions and Opinions, Number 19, Jul 94).
- g. USOPM Chicago Region Appeal Decision, Supervisory Procurement Analyst, GS-1102-13, dtd 29 Jun 95 (Huntington District, U.S. Army Corps of Engineers).
- h. USOPM Chicago Region Appeal Decision, Program Manager, GM-340-14, Internal Revenue Service, dated 29 Jul 93.

2. Due to many classification consistency issues and restructuring initiatives we currently face, this office has been exploring position classification alternatives for the classification of MSC level supervisory and managerial positions. Based on a review of position classification guidance and discussions with OPM and DOD, two methods are suggested for evaluating positions assigned supervisory and/or program management work. The discussion below, excerpted from the Introduction to the Position Classification Standards, III(F)2, explains the rationale:

[First paragraph omitted.]

“In addition to the SGEG¹, some other standards for specific occupational series provide criteria for classifying supervisory and program management work. Not all standards, however, which cover program management work also measure the difficulties and responsibilities of supervising people. Therefore, to classify a supervisory or program management position in any occupational series, users should:

- Apply criteria for measuring program management work as provided in the standard for the series to which the position is classified or in related standards or guides which measure program management duties and responsibilities.

-and-

- Apply the SGEG to positions whose supervisory duties and responsibilities meet minimum requirements for coverage by the guide.

For positions covered by standards which measure program management authorities, the grade level is typically governed by program management duties and responsibilities. For positions which are primarily supervisory, the grade level will usually be determined by the SGEG. The overall grade of the position should reflect the highest level of program management or supervisory work performed.”

3. MSC level positions may be assigned supervisory, program management and/or technical work. Each kind of work should be evaluated against criteria designed to measure that type of work. According to our discussions with OPM, program management work is considered a kind of supervisory work which involves managing a program rather than supervising employees. Generally, the criteria contained in technical standards are inappropriate for measuring program management work because the criteria was not designed to measure this type of supervisory/managerial work. In cases where the classification standard covering the work being evaluated **does not** contain evaluation criteria for managerial (program management) work, OPM recommends using both the Personnel Management, GS-201, part I and Financial Management, GS-505, standards as they contain criteria for evaluating managerial work. The criteria contained in these standards may be applied to positions assigned to administrative occupational series. Professional positions performing program management work should be evaluated against the appropriate professional standard, e.g., evaluate engineering positions assigned program management work against the General Grade Evaluation Guide for Nonsupervisory Engineering Positions. The criteria contained in the GS-201 or GS-505 standards may be used to evaluate professional positions when any of the following situations are applicable:

SGEG = Supervisory Grade Evaluation Guide, which was replaced by the GSSG in April 1993.

a. When there is no criteria for evaluating program management/managerial work in either the series to which the position is allocated or a related professional standard; and/or

b. To validate the initial determination made using the professional standard.

4. This guidance also applies to the application of the criteria contained in the GSSG. Specifically, prior to the August 1995 revision, guidance for interpreting and applying the criteria for Factor 3 of the GSSG excluded crediting staff supervision in the evaluation of this factor. DOD's revision to the USACE Implementing Instructions provided clarification on the application of criteria under this factor. If a position meets the minimum supervisory and managerial authorities of Level 3-1 over subordinate MSC staff, **and** exercises managerial authorities at Level 3-3a over subordinate districts' programs, the position may meet the criteria at Level 3-3a. Careful reading of the criteria indicates that the position does not have to fully meet Level 3-2 to receive this credit.

5. A review of recent OPM appeal decisions on Factor Level 3-3a and further coordination with DOD resulted in this policy memorandum to provide further clarification on crediting staff supervision, if the authorities and responsibilities described in Level 3-3a are met. Pages 4 and 32, HQUSACE Implementing Instructions, 1st Revision, 10 August 1995, contain the specific guidance for crediting this factor level.

6. This clarification provides instructions for the evaluation of the mixed MSC supervisor/manager position under the GSSG based on total program responsibility assigned and exercised, and full identification of the actual nature, scope and complexity of program responsibility assigned to the position, regardless of who actually implements it in the organization. For example, under the Corps of Engineers organizational structure, the real estate program is carried out by the Chief of Real Estate in the MSC, who is delegated independent authority by higher DA levels, by subordinate technical experts in the MSC, and also through the efforts of multiple subordinate organizational elements, the Districts.

7. Following are excerpts from the GSSG and several USOPM appeal decisions which demonstrate the application of the criteria contained in Factor 3-3a. This is provided to clarify the intent of this level and provide definition for some concepts contained in this factor. The appeal decision excerpts are preceded by the level definition for Factor 3-3a. To determine if an MSC level position may be credited at level 3-3a several elements must be present. These elements are numbered and identified in either bold or italicized print.

SOURCE: USOPM GSSG, dtd 10 Apr 93

The are four elements of Factor 3, identified by number below. These numbers have been inserted in each successive piece of guidance that follows in order to illustrate how the criteria is or is not met.

FACTOR 3. SUPERVISORY AND MANAGERIAL AUTHORITY EXERCISED

This factor covers the delegated supervisory and managerial authorities which are exercised on a recurring basis.....

a. (1) Exercise delegated managerial authority to set a series of annual, multiyear, or similar types of long-range work plans and schedules for in-service or contracted work. (2) Assure implementation (by lower and subordinate organizational units or others) of the goals and objectives for the program segment(s) or function(s) they oversee. (3) Determine goals and objectives that need additional emphasis; determine the best approach or solution for resolving budget shortages; and plan for long range staffing needs, including such matters as whether to contract out work. (4) **These positions are closely involved with high level program officials (or comparable agency level staff personnel) in the development of overall goals and objectives for assigned staff function(s), program(s), or program segment(s). 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 which support development of goals and objectives related to high levels of program management and development or formulation.**

SOURCE: HQDA Implementing Instructions for the GSSG, dtd 30 Jun 93

FACTOR LEVEL 3-3a. In assessing Factor Level 3-3a, careful consideration of the GSSG definition of managerial in the context of the level description is required. This level clearly envisions the performance of delegated managerial duties for an organization that has subordinate OR lower echelon units over which the supervisor has the authority to (1) **set (not simply advise on)**, (2) **assure (direct and evaluate) and (3) determine (not simply recommend) the critical aspects (i.e., long-range plans, goals and objectives, budgetary and staffing needs and solutions, etc.) of the program segment(s) or function(s) for which the supervisor is held accountable.** It is implicit that positions at this level have significant authority with full responsibility and accountability. To summarize, this level is predicated on the managerial responsibilities exercised by the supervisor having a direct and marked effect on subordinate organizations.

SOURCE: HQUSACE Implementing Instructions, 1st Revision, 10 Aug 95

Positions at Major Subordinate Commands and HQUSACE cannot be credited with Level 3-3a and Level 3-4a on the basis of exercising staff supervision alone over subordinate districts. However, if the supervisor carries out the minimum supervisory and managerial authorities at Level 3-1 for a subordinate staff and exercises the managerial authorities at Level 3-3a in relation to subordinate echelons (to include planning and budgeting for the work), the position may meet Level 3-3a.

Although many positions establish annual work plans and schedules, other criteria must be met before crediting 3-3a. (4) The supervisor must be actively involved with high level (i.e., USACE and Army) officials in determining the goals and objectives of assigned programs. If much of the planning process is centralized within the agency and the supervisor's planning efforts largely focus on how to implement the centrally developed plans, Level 3-3a should not be credited.

Excerpted from reference f:

Factor 3, Supervisory and Managerial Authority Exercised

You have raised two specific issues concerning the Region's evaluation of Factor 3. First, you believe that the Region's interpretation of Level 3-3a is too restrictive in that it concludes that this level is not appropriate because the (deleted) Personnel Officer (4) is not "closely involved with agency program officials in the development of overall goals and objectives for the USACE personnel programs.".....

Because the instructions for Factor 3 indicate that a position must carry out the responsibilities described at a particular level to the extent described to be credited with that level, it would be inappropriate to credit a level when a significant aspect of the criteria is not present in a position. (4) **The criteria for Level 3-3a include a requirement for intensive involvement in program development/management activities, as reflected by the following duty: (3) & (4) "These positions are closely involved with high level program officials (or comparable agency-level staff personnel) in the development of overall goals and objectives for assigned staff function(s), program(s), or program segment(s)." Absent this level of involvement in the agency's overall program development and program management activities, a position would not fully meet the intent of Level 3-3a, notwithstanding its location in the organizational hierarchy. There is no evidence that the (deleted) Personnel Officer participates with USACE or Department-level officials in setting goals and objectives for the agency's overall personnel management program.** Thus, the full intent of Level 3-3A is not met.....The highest level that the position fully meets is Level 3-3b (775 points).

Excerpted from reference g:

Factor 3: Supervisory and Managerial Authority

This factor covers the delegated supervisory and managerial authorities that are exercised on a recurring basis.

.....Furthermore, the Contract Division's organizational location does not provide an opportunity to exercise all the managerial authorities characteristic of level 3-3a. (3) & (4) For example, the appellant participates in acquisition planning and is responsible for planning, developing, and establishing contract strategy for Directorate acquisitions, but **provides no indication that he significantly participates with high level procurement program officials in establishing the overall goals and objectives for his program. His involvement with Directorate and District**

managers in planning contract strategy **focuses on the procurements themselves rather than the broad goals and objectives of the contract program**, an interest held by the PARC and higher agency procurement officials. Among Level 3-3a's requirements (given on page 17 of the guide) **are that a position deal extensively with high level program officials (or comparable agency level staff personnel) in developing its own organization's program goals and objectives.**

Managers at Level 3-3a typically direct the development of data to track program goals, secure legal opinions, prepare position papers or legislative proposals, and execute comparable activities. The appellant lacks significant responsibility in supporting the development of goals and objectives related to high levels of contract program management and development or formulation, as required at Level 3-3a.....

Excerpted from reference h:

Factor 3, Supervisory and Managerial Authority Exercised

This factor covers the delegated supervisory and managerial authorities that are exercised on a recurring basis. To be credited with a level under this factor, a position must carry out the authorities and responsibilities to the extent described for the specific level. Levels under this factor apply equally to the direction of specialized program management organizations, line functions, staff functions, and operating and support activities. The agency credited Level 3-3 for this factor.

Level 3-3 describes two situations, either of which meets the level. In the first situation, the position exercises delegated managerial authority to set a series of annual, multi-year, or similar long-range workplans and schedules for in-service or contracted work; assure implementation by subordinate organizational units of program goals and objectives; determine which goals and objectives need additional emphasis; determine the best solution to budget shortages; and plan for long range staffing needs. Positions in this situation are closely involved with high level program officials or comparable agency staff personnel in developing overall goals and objectives for assigned functions or programs.....

The appellant's position meets Level 3-3. (1) & (3) The first situation is not met, since most planning is accomplished on an annual basis, and he is not actively involved in determining the goals and objectives of the assigned programs. Much of the planning process is centralized within (agency) and the district planning efforts largely focus on how to implement the centrally developed plans.Since at least 12 of the 15 items are met, the second situation under Level 3-3 is creditable.

Level 3-4 also describes two situations, either of which meets the level. In the first situation, the position being evaluated exercises delegated authority to oversee the overall planning, direction, and timely execution of a program, several program segments managed through separate organizational units, or comparable staff functions. Such positions include responsibility for development, assignment, and higher level clearance of goals and objectives for subordinate organizations; approving multi-year and longer range workplans developed by subordinate supervisors; overseeing the revision of long-range

plans, goals and objectives; managing the development of policy changes; managing organizational change; and exercising discretionary authority to distribute funds in the organization's budget. In the second situation, the supervisor exercises final authority for the full range of personnel actions and organization design proposals.

Level 3-4 is not met. **While the appellant exercises considerable authority in planning and carrying out the assigned programs, he does not have delegated authority to approve long-range plans, goals, or objectives. (1) The appellant indicated that planning typically is done on an annual basis, and the objectives of the organization are largely determined at regional and national levels.** Consequently, the first situation under Level 3-4 is not met.