

CLASSIFICATION APPEAL DECISION

issued by:

U.S. DEPARTMENT OF THE INTERIOR

Washington, D.C. 20240

APPELLANT:

[REDACTED]

POSITION:

Appraiser, GS-1171-11

ORGANIZATION:

Department of the Interior
U.S. Fish and Wildlife Service
Region 4

[REDACTED]
[REDACTED]
[REDACTED]

DECISION:

Appraiser, GS-1171-11
(Appeal denied)

Carolyn Cohen

Carolyn Cohen
Director of Personnel Policy

MAR 16

DATE

Copy of Decision Transmitted to:

[REDACTED]

Kent Baum
Personnel Officer
U.S. Fish and Wildlife Service

Charlotte Westfield
Personnel Officer
U.S. Fish and Wildlife Service, Region 4

[REDACTED]

INTRODUCTION

On November 16, 1998, Dorothy [REDACTED] appealed the classification of her position to the Director of Personnel Policy, Department of the Interior. [REDACTED] is employed as an Appraiser, GS-1171-11, in the Fish and Wildlife Service, Region 4, [REDACTED]. She has appealed for reclassification of her position as Senior Staff Appraiser, GS-1171-12.

This is the final administrative decision within the Department of the Interior. The appellant may appeal the classification of her position to the Office of Personnel Management (OPM) in accordance with the procedures described in Appendix 4 of the Introduction to the Position Classification Standards. Information about submitting an appeal to OPM is included in the decision letter to the appellant.

SOURCES OF INFORMATION

In deciding this appeal, we considered information from the following sources:

1. The appellant's letter of appeal, along with an attached copy of her current position description, and a copy of the November 4, 1998, memorandum from her servicing personnel office denying her request for a higher grade.
2. The material submitted by the Fish and Wildlife Service on January 19, 1999, including the functional statement and organization chart for the Division of Realty, Notification of Personnel Action (SF-50) for the appellant, the appellant's current performance plan, and the position description and evaluation statement for the position held by the appellant's supervisor, [REDACTED] Supervisory Appraiser.
3. Additional material submitted by the Fish and Wildlife Service on February 10, 1999, including the appellant's current position description, an evaluation statement for the position, and a response to her classification appeal.
4. Additional material submitted by the appellant on February 22, 1999, including three revenue sharing (appraisal) reports, the Regional Review Appraiser's comments on one of the appellant's recent appraisal reports, and a log of appraisal projects from 1994 and 1995.
5. Telephone audit of the appellant's position on February 25, 1999, and follow-up conversations with her on March 2 and March 4; a telephone interview with [REDACTED] on February 26, 1999.
6. Telephone interviews with the following individuals: [REDACTED] the appellant's representative, on February 25, 1999, and [REDACTED] Regional Review Appraiser, on March 1 and March 3, 1999.

POSITION INFORMATION

The appellant serves as a staff appraiser on Ecosystem Team II in the Realty Division. She is responsible for medium to large appraisal assignments, including some with large acreage tracts, tracts with a high timber value, expensive coastal properties, islands, and single-purpose properties. She appraises property in Alabama, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee. She conducts field inspections of all subject properties; makes personal contacts; conducts market research; aids in the preparation of ascertainment reports; produces appraisal reports, charts, and graphs; contracts for appraisals, forestry consultant services, engineering development feasibility studies, and other services; and performs other related duties.

SERIES AND TITLE DETERMINATION

The position is properly placed in the Appraising Series, GS-1171, which covers positions that involve supervising or performing work in appraising and reviewing the appraisals of real or personal property interests. Positions in this series require technical knowledge and skill in the application of the principles, practices, and techniques of appraisal, as is the case with the appellant's position. Appraiser is the title for all nonsupervisory positions in this series primarily responsible for appraising property. The appellant appraises real property; accordingly, Appraiser is the appropriate title for the position. The title requested by the appellant, Senior Staff Appraiser, is not authorized as an official title in the GS-1171 series.

GRADE DETERMINATION

The grade of the appellant's position is determined by application of the position-classification standard for the Appraising Series, GS-1171. The standard is written in the Factor Evaluation System (FES) format. Under the FES, positions are placed in grades on the basis of their duties, responsibilities, and qualifications required as evaluated in terms of nine factors common to nonsupervisory General Schedule positions.

A point value is assigned to each factor based on a comparison of the position's duties with the factor-level descriptions. The factor point values mark the lower end of the ranges for the indicated factor levels. For a position factor to warrant a given point value, it must be fully equivalent to the overall intent of the selected factor-level description. If the position fails in any significant aspect to meet a particular factor-level description in the standard, the lower point value must be assigned.

Factor 1, Knowledge Required by the Position

At Level 1-7, employees use knowledge of a wide range of appraisal concepts, principles, and practices to appraise and/or review the appraisals of properties with complex characteristics and to analyze complicated valuation problems. This may include resolving value problems for

properties with limited comparable sales, multiple or questionable ownerships, numerous encumbrances, various possible highest and best uses that may be entirely different from the current use, unusual physical constraints, sensitive environmental concerns, partial takings whose use will have a negative impact on the remainder of the property, and other equivalent characteristics. Employees use this knowledge to devise strategies and plans for resolving property value problems; modify, adapt, or depart from established appraisal techniques and procedures; and/or assess, select, and make use of appraisal precedents.

Employees at Level 1-7 use data gathering skill and ingenuity to locate information that is not readily available, e.g., in acquiring data about comparable sales when few, if any, exist, or finding sources of information about properties with uncommon characteristics. They use appraising knowledge and skill to analyze and interpret the effects of unstable social, economic, and political trends on property uses and values. Such trends may include changing market conditions, zoning problems, and conflicting public and private interests. They use a comprehensive knowledge of the valuation approaches and various appraisal techniques to adapt and apply the most appropriate appraisal methods for analyzing the available data.

The appellant uses knowledge of a wide range of appraisal concepts, principles, and practices to appraise real property with complex characteristics such as refuges, tracts of undeveloped land that are to be acquired and added to existing refuges, and fish hatcheries. Complicating characteristics may include lack or absence of comparable sales, easements and rights of way (e.g., for tracts that are surrounded by a refuge), unusual physical characteristics (e.g., wetlands, islands), remote locations or difficult access (e.g., tracts that are accessible only by boat), and sensitive environmental concerns (e.g., the presence of endangered species). Because of such complications, she must devise strategies and plans for resolving property value problems, and select from a variety of appraisal precedents in estimating values. For example, she must decide how to obtain data and other information that are not readily available to resolve valuation problems, and she must decide which appraisal methods to use (sales comparison, cost, or income). She interprets the effects of changing economic conditions on property uses and values, for example when she estimates the costs and income that may be derived from alternative uses of property, such as for farming or timber harvesting. These types of knowledge are a close match for Level 1-7. The assignment of Level 1-7 is confirmed by reference to the illustrations at this level. The appellant's work corresponds to the first illustration at 1-7, i.e., appraisal of agricultural lands and timberlands, and appraisal of properties with complications such as environmental issues.

At Level 1-8, employees apply a mastery of appraisal concepts, principles, and methodologies. They function as technical authorities and must apply new theories and standards to appraisal problems or assignments that are not susceptible to treatment by accepted and established appraisal procedures, or for which no accepted or established appraisal procedures exist, or where conflicts exist between policy and program objectives. For example, appraisers who perform work that requires knowledge at this level may appraise a broad range of properties with extremely complex characteristics similar to those of a military base or a large forest with a

variety of diverse and often conflicting recreational, mining, timber, commercial, industrial, or residential uses. They may evaluate the impact of new or modified appraisal, real estate, tax, and environmental legislation on current and projected appraisal standards and programs and prepare important policy changes based on the impact. Appraisers at this level may also provide guidance to staff and fee appraisers on the interpretation and implementation of new or modified policies.

The appellant's duties do not require application of these types of knowledge. She is not required to have a mastery of appraisal methods to function as a technical authority for the Service or the Region. For example, it is not her responsibility to determine the impact of new legislation on the appraisal program, nor does she assess policy changes and advise the appraisal staff on such issues. Her appraisal work involves numerous complications, as discussed above, but does not involve assignments that are not susceptible to established procedures, such as those involving large tracts with numerous conflicting uses and extremely complex characteristics, as described at Level 1-8. Therefore, this level is not credited.

Level 1-7

1250 points

Factor 2. Supervisory Controls

At Level 2-3, supervisors define the objectives, priorities, and deadlines of the appraisal assignment and assist employees with situations that have no clear precedents such as uncommon locations of data, nonstandard uses of appraisal techniques, or methods for analyzing property types unfamiliar to the employee. They identify the kinds of problems to anticipate in carrying out the appraisal or review assignment. At Level 2-4, supervisors set the overall objectives and identify the resources available. Employees and supervisors, in consultation, develop the deadlines, projects, and work to be done such as ways to appraise or review the appraisals of properties with complicated or unusual characteristics.

The work is assigned to the appellant in a manner consistent with Level 2-3. Her supervisor (or, at the request of the supervisor, the Regional Review Appraiser) defines the assignments and assists the appellant with planning appraisals with no clear precedents. The appellant's assignments are not consistent with Level 2-4. Assignments with complicated or unusual characteristics are made with more specificity than by merely defining the objectives and resources available. Therefore, Level 2-4 is not met in terms of how the work is assigned.

At Level 2-3, employees plan and carry out the successive steps and handle problems and deviations in the work assignment in accordance with instructions, policies, previous training, or accepted appraisal or review practices. At Level 2-4, employees plan and carry out the assignment, resolve conflicts that arise, coordinate the work with others, and interpret policy on their own initiative in terms of established objectives. The employees keep supervisors informed or progress and potentially controversial matters such as probable condemnation cases.

The appellant's responsibility for carrying out the work meets Level 2-3. She works quite

independently when she does the field work for her appraisal assignments. She carries out the necessary steps to complete the work that must be done, e.g., in handling problems with obtaining the data needed to complete the appraisal. However, she does not plan and carry out assignments with the level or responsibility described at Level 2-4, i.e., in the absence of instructions and involving policy interpretation. Therefore, Level 2-4 is not met in terms of the responsibility for carrying out the work.

At Level 2-3, completed work is evaluated for technical soundness, appropriateness, and conformity to policies and procedures. Appraisal reports are reviewed for adequate, relevant, and logistical presentation of data, accurate calculations, and valid conclusions based on the information in the report. At Level 2-4, the work is reviewed for overall feasibility, compatibility with other appraisals, and effectiveness in meeting program goals and requirements. Completed appraisals are reviewed for adherence to appraisal standards, clarity of presentation, and soundness of conclusions.

The Regional Review Appraiser reviews the appellant's work for technical soundness, appropriateness, and conformity to policy and procedures. He checks the appropriateness of her appraisal method, presentation of data, calculations, and conclusions. He returns appraisals for further work as necessary. This level of review is consistent with Level 2-3, and is closer than the review for overall feasibility, effectiveness, clarity, and soundness described at Level 2-4. Therefore, Level 2-4 is not met in terms of how the work is reviewed. Because the appellant's level of supervision received matches Level 2-3 in terms of all three subfactors described, and does not meet Level 2-4 in terms of any of the subfactors, Level 2-3 is assigned.

Level 2-3

275 points

Factor 3, Guidelines

At Level 3-3, a number of guidelines are available, but may not be completely applicable to the work. Guides include appraisal policies, regulations, and standards, real estate and tax regulations, and other procedures. The guides cover most requirements, problems, circumstances, or data-gathering and analysis techniques used in the appraisal process. At Level 3-4, guidelines are agency policies, precedents, and appraisal standards and laws that provide a general outline of the concepts, methods, and goals of appraisal programs. Guides are of limited use and inadequately cover complex, controversial, or unusual appraisals.

The main guidelines available to the appellant are the Uniform Standards of Professional Appraisal Practice, and the Department of Justice Uniform Appraisal Standards for Federal Land Acquisition. She also uses the Departmental realty manual, which provides standard formats for appraisal reports. These guides provide a general outline of the methods and standards for appraisals, but they do not cover all the circumstances and techniques used in the appraisal process, nor do they adequately cover complex, controversial, or unusual appraisals. Therefore, the nature of the guidelines is consistent with Level 3-4.

In terms of the judgment needed to apply the guidelines, at Level 3-3, employees use judgment to interpret and adapt the guides and to modify the information available to fit the situation. Appraisal methods and techniques normally applied require some adaptation to the peculiarities of the assignment. At Level 3-4, employees use initiative and ingenuity to deviate from standard appraisal processes and review procedures. They conduct research to identify and develop new sources of unusual or hard-to-obtain data, devise innovative methods and techniques for estimating the value of properties with unique and complex characteristics, and propose new or revised policies.

The judgment required of the appellant in applying the available guidelines available meets Level 3-3. They often are of limited use in specifying what is to be done in complex appraisal projects, and she must modify the information that is available to complete her appraisal assignments. However, she is seldom required to deviate from standard processes or procedures. In addition, she is not required to devise methods and techniques, and her assignments do not include proposing new or revised policies. Therefore, her position does not meet Level 3-4 in terms of the second subfactor, judgment required. Because the position meets Level 3-4 in terms of the first subfactor, the nature of the guidelines, but does not meet Level 3-4 for the second subfactor, the judgment needed to apply them, Level 3-3 is credited. A factor level must be fully met in order to be credited.

Level 3-3

275 points

Factor 4, Complexity

At Level 4-4, the work involves the use of many different and unrelated appraisal processes and methods. Properties to be appraised typically involve such complications as few comparable sales, comparable sales requiring extensive value adjustments between the subject property and the property used for comparison, a wide variety of legal or environmental concerns, or diverse or unclear uses. Properties are located in a variety of different market areas that may involve changing or unstable economic or social conditions.

The appellant's appraisal assignments involve the types of complications typical of this level, including lack of comparable data, zoning restrictions, diversity of types of properties, changes in market conditions, and environmental concerns. Recent projects include appraisals for acquisition of the Pine Beach subdivision in the Bon Secour NWR in Alabama, and Paradise Point, which is part of the Waccamaw NWR in South Carolina. For the Pine Beach appraisal, there were no comparable sales or income data, and the appellant had to adjust values obtained from property sales outside the area. The Paradise Point appraisal was complicated by water-only access, property that is not practical to build on, and a river with extensive environmental regulations to be considered. Another recent appraisal for a revenue sharing report involved fish hatcheries, one in Orangeburg County, South Carolina, and the other in the town of Orangeburg, which was experiencing changing economic conditions. Assignments of these types are consistent with Level 4-4.

In terms of the difficulty in identifying what needs to be done, appraisers at Level 4-4 plan appraisal projects, determine the types and sources of data needed, select and apply the appropriate valuation approach, and recommend a value or solution to a property valuation problem. Valuation requires extensive interpretation and evaluation of a wide variety of property data. Because of the characteristics of the real property appraised by the appellant, such as lack of comparable sales and environmental concerns, the appellant must determine the data needed from a wide variety of possible sources, such as city and county records, sales of property that is not comparable to the property being appraised, value of wetlands and timber, and adjustments for the presence of endangered species. These types of difficulties correspond to Level 4-4.

In performing the work, employees at Level 4-4 use originality in planning the scope and direction of appraisal assignments and in deciding how to extend and modify existing methods and techniques for application to complex property valuations. For example, employees may adjust limited or out-of-date sales comparison information or apply different combinations of valuation approaches or variations of appraisal techniques. Because of the rural, undeveloped nature of property appraised, the appellant often adjusts sales comparison information for property that has little comparability to the property being appraised. She also has to apply various valuation approaches (sales comparison, cost, or income) for the different types of property she appraises. This type of work also corresponds to Level 4-4.

At Level 4-5, the work involves various duties, projects, or studies requiring many different and unrelated processes, substantial depth of data and value analysis, and significant departures from established appraisal practices and procedures to estimate values or to develop and implement new methods and analysis techniques. Properties involve a broad range of unusual or controversial characteristics, sensitive or controversial issues, or a large variety of diverse, little known, or undefined market areas and conditions. Properties may involve a mixture of conflicting potential uses and values, such as in a military base, or involve unique uses. The appellant's work does not involve significant departures from established appraisal practices and procedures. Although the properties she appraises are characterized by significant complications, as cited above, the appraisal methods she uses are more standard than those contemplated at Level 4-5. Her assignments are more narrowly defined than are those with the broad range of problems found at this level (e.g., appraisal of a military base with a mixture of uses).

Employees at Level 4-5 decide what to do by considering appraisal theories, concepts, and practices where guidelines, precedents, or policies may be lacking and/or data may be unavailable or nonexistent. They study valuation theories and concepts to identify and develop new or unique appraisal techniques or criteria for estimating values. Employees at this level also evaluate new or changed techniques and procedures for conflicts with existing requirements. The appellant's appraisal assignments sometimes involve value determinations that must be made in the absence of adequate data. However, she does not function without precedents or guidelines. Much of her work involves revenue sharing projects, which are updates of earlier appraisals, usually five years old or more. While these appraisals can be difficult and present numerous complications, such as those discussed above (e.g., changing economic conditions, and environmental concerns), they are

not unprecedented and do not require the appellant to develop new appraisal techniques. She states that she modified techniques for the No Name Key project in Florida, but this appraisal was completed in approximately 1989 and does not represent a pattern of regular and continuing work. In addition to the revenue sharing projects, she also works on acquisition appraisals, but this work also does not involve developing new appraisal techniques or evaluating new techniques and procedures.

Assignments at Level 4-5 require significant departures from established appraisal practices and procedures to (a) plan, organize, and conduct valuation projects for properties with unusual combinations of diverse characteristics, requiring the use of highly modified appraisal techniques; (b) review the methodology used and conclusions made in staff and fee appraisal reports for their impact on existing appraisal policies and goals; (c) consider the effect of new standards on existing appraisal programs and prepare policy and procedural changes; and/or (d) develop instructions and guidelines for new methods, including anticipating problems that may arise. The appellant's assignments do not require her to depart from established practices or procedures, and she does not perform the types of assignments listed at this level. She does not use highly modified appraisal techniques to complete the revenue sharing or acquisition appraisals that she is assigned. She does not review appraisals made by other staff members. She does oversee fee (contract) appraisers' work, but the technical review of their appraisals is performed by the Regional Review Appraiser, who reviews all appraisals prepared by staff and contract appraisers. She does not assess program implications of new standards or develop instructions or guidelines for new appraisal methods; management in the realty program is responsible for these types of functions. Thus, because the complexity of the appellant's work does not meet Level 4-5 in terms of these criteria or those described above, this level is not credited.

Level 4-4

225 points

Factor 5, Scope and Effect

At Level 5-3, the purpose of the work is to resolve a variety of conventional problems, questions, or situations. Employees at this level appraise properties clearly comparable with others in kind and value, independently review staff and fee appraisal reports, or recommend actions based on valuation studies of specific property characteristics. They use well-established appraisal standards, criteria, methods, techniques, and procedures. The purpose of the appellant's work is to provide well-documented and supportable appraisals of real property. She normally uses well-established appraisal standards, criteria, methods, and procedures. However, her appraisals sometimes involve problems that exceed the purpose described at this level, examples of which are discussed above. For example, the Pine Beach property appraisal involved adjustments because there were no sales of property that were clearly comparable in value. Therefore, the purpose of her work somewhat exceeds Level 5-3.

At Level 5-3, completed reports and recommended values affect the efficient completion of real property transactions. Recommendations also affect the adequacy of activities such as real or

personal property value negotiations, loan issuance, or tax law application. Value estimates may affect the economic well-being of property owners, lessees, or permit holders. The appellant's reports are used as the basis of the Service's land acquisition program, often for acquiring land to add to existing refuges. Her work affects the efficient completion of these acquisitions, such as those involving the Pine Beach and Paradise Point properties. In addition, the appellant's revenue sharing reports are used to determine the amount of payments to local governments in lieu of taxes, such as the appraisals of the fish hatcheries in Orangeburg. Such work is a close match for Level 5-3.

At Level 5-4, the work involves planning and completing complex valuation projects. Employees develop new or modified techniques and methods to appraise and review the appraisals of properties with diverse or unusual characteristics. They may investigate and analyze a wide variety of problems and questions to provide guidance on specific appraisal standards, methods, and techniques, and to recommend new or modified policies. The appellant plans and completes valuation projects, some of which are complex, such as appraisals on properties with no comparable sales. However, she does not develop new or modified techniques to appraise such properties, nor does she review appraisals prepared by other employees. In her appeal, she refers to her modification of techniques in the appraisal of the No Name Key, but this work was done in 1989. Her current work does not require her to develop or modify appraisal techniques. In addition, the purpose of her work does not include responsibility for providing guidance on appraisal standards or methods, and she does not have policy responsibility. Therefore, even though the purpose of her work somewhat exceeds Level 5-3, it does not meet Level 5-4.

At Level 5-4, recommendations and advice affect a range of agency activities, including the efficient completion of appraisal projects to meet program objectives and the effective management and use of real property. New or modified techniques used in appraisal reports and property analysis set precedents for future valuation projects. Results of the work may affect the economic well-being of the agency, client agencies, taxpayers, or other entities such as wildlife refuges, national parks, or state or local governments. The effect of the appellant's work does not extend beyond the effect on completion of real property transactions credited at Level 5-3. She is not responsible for projects that can be said to affect a wide range of agency activities, and she does not modify appraisal techniques. In addition, her work does not affect the refuges, beyond the completion of property transactions. Property acquisitions are not funded from the budgets of the refuges that are being expanded. Some of the properties appraised for revenue sharing purposes involve significant payments to counties, but she is not responsible for making decisions that directly affect the economic well-being of county governments, as contemplated at this level. Because the appellant's work does not meet Level 5-4 in terms of either purpose or effect, Level 5-3 is credited.

Level 5-3

150 points

Factor 7, Professional Contacts and Factor 7, Purpose of Contacts

At Level 3, the appellant contacts individuals or groups from outside the employing agency in a moderate manner, including such as private sector appraisers, brokers, property owners, tax assessors, attorneys, engineers, and builders. The appellant's contacts include other appraisers, real estate agents, mortgage managers, and others, primarily in Region 4. Her outside contacts include individuals from other agencies, including employees of state departments of natural resources, and tax assessors and other employees in county governments, as well as real estate agents, appraisers, developers, and builders. Such contacts meet Level 3. This is the highest level of contacts described in the standard, and the appellant's contacts do not exceed this level in any aspect.

At Level c, the purpose of contacts is to influence or question persons to take certain actions, such as to provide property data. People contacted may be skeptical or unwilling to provide the information. Employees at this level must have the skill to establish rapport with uncooperative contacts and to approach and persuade individuals or groups to obtain the desired effect. Particularly in dealing with outside contacts, the appellant must question them to provide property data or other information needed to complete appraisals. Some of these individuals are not cooperative and do not wish to provide the information she requests. She must be persuasive in order to get such individuals to cooperate. These types of contacts meet Level c. The appellant's contacts do not meet Level d, at which the purpose is to justify, defend, negotiate, or settle matters involving significant or controversial topics, usually in conferences, meetings, or hearings.

Level 6-3/7-c

180 points

Factor 8, Physical Demands

At Level 8-2, the work regularly requires some physical exertion such as long periods of standing; walking over rough, uneven, or rocky surfaces; recurring bending, crouching, stooping, stretching, or reaching; or similar activities. Site inspections may require some exertion. The appellant works in both office and field environments. Field inspection trips involve strenuous physical activity, including walking over rough terrain, wading swamps and marshes, and climbing in and out of boats where no dock is available. These types of physical demands are consistent with Level 8-2. This is the higher of the two levels described in the standard, and the physical demands of the appellant's work do not exceed this level in any aspect.

Level 8-2

20 points

Factor 9, Work Environment

At Level 9-2, the work regularly involves moderate risks or discomforts associated with visiting sites with limited access or remote areas that require special safety precautions such as wearing protective hardhats, boots, masks, goggles, or gloves. The appellant's field trips include visits to

remote areas, some of which have limited access, and involve exposure to high temperatures and humidity, cold temperatures, and wading swamps and marshes. Such environments require the appellant to use sun protection, hats, heavy coats, gloves, and boots for protection against water and snakes. These types of environmental exposure meet Level 9-2. This is the higher of the two levels described in the standard, and the appellant's work environment does not exceed this level in any aspect.

Level 9-2 20 points

EVALUATION SUMMARY

<u>Factor</u>	<u>Level</u>	<u>Points</u>
1 Knowledge Required by the Position	1-7	1250
2 Supervisory Controls	2-3	275
3 Guidelines	3-3	275
4 Complexity	4-4	225
5 Scope and Effect	5-3	150
6/7 Personal Contacts/Purpose of Contacts	6-3/7-c	180
8 Physical Demands	8-2	20
9 Work Environment	9-2	<u>20</u>
	Total	2395

The total number of points credited, 2395, converts to a grade of GS-11 (2355-2750) according to the grade-conversion table in the standard.

DECISION

For the reasons given above, the authorized classification of the appealed position is Appraiser, GS-1171-11.