

CLASSIFICATION APPEAL DECISION

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U.S. DEPARTMENT OF THE INTERIOR

Washington, D.C. 20240

APPELLANT:

[REDACTED]

POSITION:

Historian, GS-170-11

ORGANIZATION:

Department of the Interior
National Park Service
Northeast Region

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

DECISION:

Historian, GS-170-11
(Appeal denied)



David M. Anderson
Office of Personnel Policy

APR 7 1999

DATE

Copy of Decision Transmitted to:

[REDACTED]

J. Lynn Smith
Personnel Officer
National Park Service

Jim Brown, Personnel Officer
Philadelphia Support Office
National Park Service

INTRODUCTION

On December 28, 1998, [REDACTED] appealed the classification of his position to the Director of Personnel Policy, Department of the Interior. [REDACTED] is employed as a Historian, GS-170-11, in the National Park Service, Northeast Region, [REDACTED]

[REDACTED] He has appealed for an upgrade of his position to the GS-12 level.

This is the final administrative decision within the Department of the Interior. The appellant may appeal the classification of his 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 and attachments, including his current and previous position descriptions, the evaluation statement for the position, a memorandum from the servicing personnel office turning down his request for an upgrade of his position, memoranda describing the assignment to him of the responsibility for managing the [REDACTED] Library at [REDACTED] and describing the significance of the library, and position descriptions for two GS-12 historian positions at other national historical parks.
2. The material submitted by the National Park Service on February 12, 1999, including the current and previous organizational charts and functional statement for the Division of I&CRM, Notification of Personnel Action (SF-50), the appellant's performance plans for fiscal years 1997 and 1998, and the current position description and evaluation statement.
3. Telephone audit of the appellant's position on March 23 and 26, 1999, and a telephone interview with [REDACTED] Supervisory Park Ranger and Chief of the Division of I&CRM, on March 26, 1999.

POSITION INFORMATION

The appellant serves as the [REDACTED] Park Historian and is responsible for professional research support to the park's resource preservation, public information, and interpretive functions. He also manages the park library.

The appellant's duties include the following:

Plans and carries out a series of definitive historical studies relating to [REDACTED] and covering related fields such as military, agricultural, diplomatic, social, political, and industrial topics.

Identifies research projects and preservation needs, determines the scope of research needed, plans the approach to the project, and initiates action to ensure completion. Synthesizes applicable information from other disciplines, such as archaeology and historical architecture for use in projects.

Prepares and presents papers to staff and prepares and gives talks to interest groups, the public, and other professionals.

Locates and provides research material for preparation of exhibits, publications, and audiovisual programs. Reviews for historical accuracy, thoroughness, and applicability material prepared by other NPS staff, outside professionals, academics, writers, and others. Actively seeks new primary and secondary material, both published and archival.

Participates in planning activities with emphasis on those involving the history and cultural resources of the park and related areas. Initiates funding and planning requests to ensure that park history, cultural resource management, and information management needs are adequately met.

Responds to inquiries of a highly technical or specialized nature from scholars or others pertaining to historical research subjects and applicable study methods and procedures.

Plans and manages the operation of the [REDACTED] Library, develops new guidelines for library management, and evaluates material and initiates acquisition of library materials in various formats from a variety of sources. Coordinates library work performed by volunteers and interns and manages the cataloging and processing of all incoming materials, much of which requires independent interpretation and judgment due to its specialized nature. Instructs the staff and visitors on the use and content of library resources and provides professional assistance to staff, visitors, and the public, as well as to professional researchers and academics.

According to the position description and the organization chart, the appellant reports to the Chief of the Branch of Cultural Resources. However, in practice, he has reported directly to the Chief, Division of I&CRM for several years (almost two years to the current incumbent, [REDACTED]). The park changed the reporting relationships for several positions in March 1999, and the appellant now reports to the Branch Chief in practice as well as on paper. Because [REDACTED] is familiar with his work, the supervisory interview for this appeal was conducted with her.

SERIES AND TITLE DETERMINATION

The appellant's position is correctly placed in the History Series, GS-170, which includes positions that advise on or perform research or other work in the field of history when such work requires a professional knowledge of established methods and techniques of historical research in the collection, evaluation, analysis or presentation of historical facts. Historian is the prescribed

title for positions in this series.

In addition to his work as Park Historian, the appellant also manages the park library. Because the appellant is not a professional librarian and does not function in that capacity, his work in the library is not appropriately placed in the Librarian Series, GS-1410, which requires primarily a full professional knowledge of the theories, objectives, principles, and techniques of librarianship. The Technical Information Services Series, GS-1412, which is not a professional series, includes positions that involve performance of work in developing, coordinating, processing, and transmitting specialized information. The work in this series requires a broad knowledge of one or more scientific, engineering, technical, or other disciplines or fields, and a practical knowledge of one or more techniques for organizing, accessing, or disseminating information. This description suggests that the GS-1412 series is appropriate for classification of the appellant's responsibility for the library. However, the appellant states that much of his work in the library overlaps with his work as the Park Historian. The [REDACTED] Library is primarily a library of the history of [REDACTED] and related topics, e.g., of the Revolutionary War and of Southeast Pennsylvania. Therefore, while some of the appellant's work in the library is characteristic of the GS-1412 series, his work there is primarily characteristic of the GS-170 series. This conclusion is supported by reference to the standard for the GS-1412 series, which directs the following in the exclusions section: "Classify positions in the series appropriate for the discipline involved that require(s), as the most important qualification, the use of professional knowledge in a science, engineering, mathematics, or other scholarly field." That is, positions that may involve aspects of library work but that primarily function in another profession, such as history, should be classified in the series of the primary function. It is clear that the appellant's work as Historian is the primary work of his position and that it represents the paramount knowledge required and the reason for the position's existence. Therefore, the position is properly classified in the Historian Series.

GRADE DETERMINATION

The appellant's Historian work is evaluated by reference to the classification standard for the History Series, GS-170, which is written in the narrative format. The standard presents the grade level descriptions in terms of two classification criteria: Nature of the Assignment and Level of Responsibility. The Factor Evaluation System (FES) is not used in the evaluation of the position because the standard is not written in FES format.

Nature of the Assignment

At the GS-11 level, assignments usually involve one or more major topics or themes of history and require consideration and treatment of several related topics in order to place the study in its proper context. An illustrative assignment at this level involves planning and carrying out a series of historical research projects for a national historical park which centers around a single major historical theme and time period, e.g., a major Civil War battle, but which requires a variety of definitive special studies to establish boundaries, determine location of events, and provide

historical data for use in the reconstruction or restoration of the area.

██████████ Historical Park is characterized by one major theme. Although no battles were fought at ██████████ the area was the site of the encampment of George Washington's army from December 1777 to June 1778. Living conditions for the soldiers were quite severe during the winter due to lack of adequate food and clothing as well as crowded, damp quarters. As a result, approximately 2,000 soldiers died at hospitals in the surrounding area, primarily due to disease. However, ██████████ was also important for later victories in the American Revolution because the army, which was ill-equipped and lacking in proper training when it entered the area in December, was trained and developed into an effective fighting force during the encampment.

The appellant's work as Park Historian is a close match for the type of assignment described at the GS-11 level. The history of the park involves one major historical theme, i.e., the encampment at Valley Forge and its relation to the larger context of the Revolutionary War. In addition, there are several other themes related to the area including nineteenth century industrial, agricultural, and commercial development, and over 120 years of site preservation activities. A variety of studies are required for definitive interpretation of the events at Valley Forge and for use in reconstruction of the area. Some of the appellant's recent or current historical research projects include: a study completed last year that resulted in a 400-page report on the weather of the period based on anecdotal accounts from American and British troops and civilians in the area; an ongoing study of the huts that were constructed to house the troops, as no original huts remain; an ongoing study of all aspects of the medical problems and treatments available for the sick and injured at Valley Forge; and an ongoing study of fortifications that the army built to protect against attack by the British, as few of the original fortifications remain. The scope and complexity of these types of projects that are related to the major theme of Valley Forge correspond to the GS-11 level.

Assignments at the GS-11 level typically involve problems of the type and complexity described at the GS-9 level in several or all phases of their accomplishment. These include problems of organization and analysis, or difficulty in the critical evaluation of the evidence and in the establishment of historical fact. There are likely to be gaps in evidence, conflicting evidence or questions of reliability of evidence. Resolution of the problems requires the historian at the GS-11 level to employ (1) a good knowledge of available research sources, (2) a good grasp of the primary subject matter involved and of related subject-matter fields (in order to achieve complete coverage of significant sources), (3) sound critical judgment in the evaluation of sources and the establishment of historical fact, and in the development of hypotheses to account for casual relationships, and (4) substantial skill in organizing and writing a narrative that sets forth a balanced and realistic picture of the subject under consideration.

The appellant's assignments involve such problems. Because the encampment at Valley Forge was more than 220 years ago and was not well-documented, there are substantial gaps in evidence and information about the events that occurred there. There are both published and unpublished

documents, but much of the evidence that exists is in the form of letters and diaries from the time particularly from officers who served at Valley Forge, inasmuch as many of the enlisted men were illiterate. The reliability of such evidence is difficult to determine, and there are conflicts in the information in the various letters and diaries. For example, there is no thorough description of the entire encampment, and the various reports and descriptions contain discrepancies. Other sources of information are letters, diaries, or books written by individuals some years after the events occurred. In some cases, there are secondary sources of information from individuals who were not present at Valley Forge.

The appellant must have a good knowledge of available research sources, because such records are often difficult to locate. He must also exercise sound critical judgment in evaluating the material contained in these sources because of the problems that can result from uncritical acceptance of the information they contain, and in developing hypotheses to describe relationships. He must also have a good grasp of related subjects including the events that led up to Valley Forge, of the Revolutionary War, of the history of Southeast Pennsylvania, and of other topics that are used to describe the events, such as medical treatment and the weather conditions at Valley Forge. The appellant must have substantial skill in organizing and writing narrative reports of the historical research projects he undertakes to describe various aspects of the events at Valley Forge. These problems and the knowledge and skills required to resolve them are consistent with those required at the GS-11 level.

At the GS-12 level, assignments are distinguished from those at lower grades by their broader scope, greater depth of treatment, more varied subject matter, greater need for sound critical judgment, and the increasing number of considerations which must be taken into account. An example of an assignment at the GS-12 level is responsibility for planning and carrying out a series of historical research projects for the purposes described at the GS-11 level, for a national historical park which centers around two or more major historical themes and represents more than one time period; e.g., the area may have been the scene of important military engagements in both the Revolutionary and Civil Wars, as well as the scene of one or more other nationally significant events in the political, economic, or cultural history of the United States.

Such assignments present substantial planning problems. The magnitude of some of the assignments requires the historian to segment the research, either for accomplishment as a team effort, or to reduce the assignment to component parts of manageable proportions. The historian at this level must employ a good knowledge of the subject-matter fields involved and potential sources of historical evidence, to anticipate the major difficulties to be overcome and to develop tentative approaches to the solution of those difficulties as a part of the planning process.

The appellant's assignments clearly do not match the GS-12 level. His projects are of a more narrow scope and involve less varied subject matter and fewer considerations than would be required in planning and conducting historical research projects for a park with the characteristics described at this level. The appellant plans and carries out a series of historical research projects consistent with the GS-11 level and credited at that level. The appellant's assignments are more

narrow and less varied than the series of projects required at a park with the multiple major themes as described at the GS-12 level. The appellant's position description refers to multiple major themes of Valley Forge, such as the Revolutionary War, commercial development of the area after the encampment, and subsequent site preservation (primarily during the time the area was a state park and before it became a national park). However, Valley Forge has only one major theme in the context of the standard as described at the GS-11 and GS-12 levels, i.e., the encampment period. Therefore, the scope and complexity of the appellant's assignments do not correspond to the GS-12 level.

In terms of the GS-12 characteristic of segmenting some assignments, the appellant's projects do not require a team effort. However, he is correct in stating that the standard does not require a team approach in order for assignments to be evaluated at the GS-12 level. He also states that some of his projects are segmented. For example, his medical history research project involved consideration of diseases, hospitals, damage claims filed by churches commandeered for use as hospitals, repairs to these structures, treatments, differences in how officers and enlisted soldiers were treated, logistics of supplies, and other aspects of medicine as practiced at Valley Forge. Breaking down a project into its component parts is not equivalent to segmenting as contemplated in the standard at the GS-12 level. The standard refers to segmenting in the context of the types of projects that are characteristic of this level because of the broad and complex nature of the assignments that must be undertaken, e.g., in researching multiple major themes each of which must be segmented. The appellant must have a good knowledge of the subject-matter fields involved, including the Revolutionary War, and of particular subjects such as medical treatment and weather. However, his position does not involve the complexity or the solution of major difficulties consistent with responsibility for assignments of the scope and complexity described at the GS-12 level.

Historians at the GS-12 level engaged in studies in connection with the identification, recognition, preservation, restoration, reconstruction, or interpretation of historic sites of importance to the national historical heritage must be fully familiar with both the purposes to be served by their work and the place of their recommendations in the context of the nationwide program. The appellant's work is consistent with this criterion, in particular in connection with the recognition, reconstruction, and interpretation of Valley Forge.

In addition to problems with research, evaluation of evidence, and establishment of historical fact described at lower grade levels, GS-12 assignments present substantial difficulties in the analysis of the facts developed. The assignments require historians at this level to evolve and test hypotheses, to clarify causal relationships, and to develop a reasonable, well-balanced, and factually accurate synthesis. The problems encountered by the appellant do not exceed those described at the GS-11 level, i.e., problems of organization and analysis, difficulty in the critical evaluation of the evidence and in the establishment of historical fact, gaps in evidence, conflicting evidence, or questions of reliability of evidence. In addition, GS-11 assignments involve a number of measures to resolve such problems, including exercising sound critical judgment in the evaluation of sources and the establishment of historical fact, and in the development of

hypotheses to account for casual relationships. Any historian is expected to produce a reasonable, well-balanced and accurate product. However, the problems encountered by the appellant do not correspond to those described within the scope and complexity typical of GS-12 assignments.

Problems in presentation are also characteristic of assignments at the GS-12 level. These arise out of the necessity to present an objective and complete picture of the subject under consideration which clearly establishes the relative values and importance of the historical facts involved. The appellant does not routinely encounter problems in presentation that exceed those described at the GS-11 level, i.e., those that require substantial skill in organizing and writing a narrative that sets forth a balanced and realistic picture of the subject under consideration. Additional problems in presentation due to the requirement to deal with especially broad and complex treatments of multiple major themes, as is the case at the GS-12 level, are not found in the appellant's position.

In summary, for Nature of the Assignment, the appellant's position closely corresponds to the GS-11 level, but does not meet most of the criteria for crediting the GS-12 level. One GS-12 criterion is met, i.e., familiarity with the purposes of the work, but the scope and complexity of the appellant's assignments and the knowledge required to perform the work do not meet the GS-12 level. Therefore, the Nature of the Assignment is evaluated at the GS-11 level.

Level of Responsibility

Within the limits imposed by the scope and objectives of the assignment, which are clearly defined by the supervisor or an historian of higher grade, or established by specific directives from higher echelons, GS-11 historians typically function with professional independence. They are responsible for developing working plans and blocking out the major areas of research for the accomplishment of the assignment, for determining the approaches and techniques to be employed, and for modifying working plans and approaches as necessary in the course of the study. Typically, only modifications to working plans which would have the effect of changing the scope or coverage of the assignment are discussed with the superior prior to implementation. Supervisory historians or other historians of higher grade may be available for consultation as the work progresses, and arrangements for such consultation are possible if significant problems are encountered. Typically the completed work of GS-11 historians is reviewed for completeness of coverage, soundness of conclusions, adequacy of presentation and conformance to professional standards and agency policy, rather than for the adequacy of the research or the methodology employed.

The appellant's assignments are made by the supervisor and through the park's resource management plan. The appellant functions with professional independence. He plans and carries out his projects, and modifies the approaches as he considers appropriate. He does not consult with a higher level historian at the park as he is the Park Historian. His work is reviewed by the supervisor and others as appropriate to determine that objectives are achieved, conclusions are sound, and that general guidelines, agency policy, and professional standards have been followed.

The level of supervisory controls over the appellant's position meets the GS-11 level in terms of how his assignments are made, his independence in carrying out projects, and the level of review of his work.

Historians at the GS-11 level engaged in research programs for national historical parks are responsible for making recommendations as to the historic significance of the sites involved, and the desirability or feasibility of land acquisition or building restoration or reconstruction projects. As a reviewer of Section 106 compliance documentation for historic preservation, the appellant makes similar types of recommendations concerning the historic significance of sites on the park and the feasibility of making certain changes, e.g., concerning the Stirlings House Historic Structures Report.

Personal contacts at the GS-11 level include those described at lower grade levels, i.e., with archivists and others responsible for the maintenance of files and records for the purpose of obtaining factual information, as well as with other historians for purposes of professional consultation to give and receive information and confer on related studies. In addition, at the GS-11 level, historians establish and maintain continuing consultative relationships with historians and others both within and outside the Federal government, including professionals in related fields, such as architecture. These contacts are for the purpose of maintaining current information regarding other historical work being done in their area of interest or for consultation or collaboration with subject-matter specialists in other professional disciplines.

The appellant's contacts include other historians, preservation professionals, genealogists, librarians, archivists, academicians, reporters, representatives of special interest groups and of historical societies, and the public. These contacts are for the purpose of providing assistance to special interest groups, locating material and determining its relevancy and authenticity, giving or receiving information, conferring on related studies, and consulting with professionals in related disciplines, such as genealogy. Contacts with these types of individuals and for these purposes are consistent with the GS-11 level.

At the GS-12 level, work assignments are usually expressed in terms of the subject areas to be covered or the objectives to be served by the study. Within this framework, and the availability of time, GS-12 historians are allowed considerable latitude in setting the perimeters of their assignments. They are responsible for developing and modifying working plans as necessary to meet the objectives of their assignments. The nature of the review of their completed work is essentially the same as that described at the GS-11 level. The appellant's assignments are defined by the supervisor or established in the resource management plan, usually with more specificity than would be the case at the GS-12 level. He has considerable latitude in setting the limits of his studies. Thus, the position meets the GS-12 level in terms of his responsibility for carrying out the work and the review of the work, but not in terms of how the work is assigned.

In addition to personal work contacts of the type described at lower grade levels, GS-12 historians engaged in special historical studies for use by management officials are required to

establish and maintain continuing working relationships with management in order to keep abreast of current policy, planning, and operational problems, and to make management aware of the background resources available to them through historical research studies. The appellant is not normally engaged in these types of studies, i.e., those that require him to be involved in policy and operational matters as well as to work closely with management. His contacts are consistent with those described at the GS-11 level.

In summary, for Level of Responsibility, the appellant meets the GS-12 level in terms of some aspects of supervisory controls, although not in how his assignments are made, and does not meet the GS-12 level in terms of working closely with management on policy, planning, and operational problems. Therefore, the GS-12 level is not fully met, and the GS-11 level is credited. Inasmuch as the appellant's position meets the GS-11 level for both Nature of the Assignment and Level of Responsibility, and fails to meet the GS-12 level for both factors, the position is correctly classified at the GS-11 level.

As noted above, the appellant's responsibility for managing the park's [REDACTED] Library is closely related to his work as Historian. In any case, the appellant estimates that the library work accounts for about 20 percent of his time. The OPM Introduction to the Position Classification Standards and the Classifier's Handbook both specify that duties performed for less than 25 percent of the time cannot be grade-controlling. Therefore, the appellant's library work cannot affect the grade of his position as determined by application of the standard for the History Series, and the library work is not separately evaluated in this decision. However, even if the appellant's library work were evaluated by application of the standard for the Technical Information Services Series, GS-1412, the result would likely be a grade of GS-9 due to the complexity of the material in the library and the knowledges required to manage the collection. We don't anticipate circumstances in which the library work would exceed the GS-11 level. Therefore, if the current library work should ever account for 25 percent or more of the appellant's duties, and if the work were evaluated separately from his work as Park Historian, the grade of his position would not exceed the GS-11 level.

DECISION

For the reasons given above, the authorized classification of the appealed position is Historian, GS-170-11.