POSITION EVALUATION STATEMENT

Proposed Title, Series, Grade: Wildland Firefighter, GS-0456-13

Position Number: DOI SPD DX04500 (National Program Manager)

Background: This Standard Position Description (SPD) was developed by an Advisory Work Group made up of a team of fire subject matter expert and classification specialist and is representative of fire planning work performed. The major duties listed in the SPD were identified through a thorough analysis of the 0456 Wildland Firefighter standard.

References: Position Classification Standard for Wildland Fire Management, 0456, June 2022; Position Classification Standard for Safety and Occupational Health Management Series, GS-0018, TS-55 August 1981; 5 U.S. Code § 5104, Basis for grading positions.

Series & Title Determination: The 0456 Wildland Fire Management series is a single-grade interval series that includes classes of position which involve technical and specialized work on the protection of forest or range lands and resources from fire. This series includes general fire management work which is preparatory to the assumption of technical or specialized assignments, and which is accomplished as a part of specialized functional fire management programs including forest, and range fire prevention, presuppression, suppression, post-suppression, fire research, and other specialized work relating to fire management programs.

The PCS is divided into three parts. Part I contains occupational information applicable to Federal work covered by the PCS without regard to pay plan or classification system. Part II provides the grading criteria for positions classified in accordance with GS grade definitions. Part II- Grading Information, is further broken down into *Part 1* (grade level criteria for Wildland Firefighting Positions), and *Part II* (grade level criteria for Fire Mangement Officer Positions). Part III includes explanatory material about the developement of the PCS.

This position works at the National or headquarters level within a bureau of the Department of the Interior. The primary purpose is to serve as a National Program Manager, providing oversight and authoritative advice and guidance in program and policy development, interpretation, and implementation to fire management agencies across the United States on all organizational levels. The position is also a Bureau level subject matter expert in resource need forecasting and allocation. The work involves assessing and improving the safety, effectiveness, and efficiency of fire management programs including planning, aviation, fire operations, fuels management, and prevention. The position requires expert knowledge of wildland fire behavior, wildland fire control, wildland fire planning, fuels management, and aviation management activities to recommend substantive program changes requiring the development of new, or modification of existing, wildland fire management policies and practices for the resolution of fire management problems. It also requires expert level knowledge of wildland fire behavior, wildland fire control, wildland fire planning, fuels management, and aviation management activities sufficient to perform consultative, program development, and oversight services for these programs. As described the position meets the nature and intent of the 0456 Wildland Fire Management series.

The basic title for positions that involve technical and specialized work on the protection of forest or range lands is *Wildland Firefighter*. Therefore, this position is appropriately assigned to the 0456 series and titled as a ***Wildland Firefighter, GS-0456.***

Grade Determination:
This position may exercise delegated supervisory authorities and responsibilities a maximum 20% of the time. These authorities exceed those typical of work leaders and include assigning and reviewing work daily, weekly, or monthly; assuring that production and accuracy requirements are met. However, the supervisory work does not meet the minimum coverage criteria by the General Scheduled Supervisory Guide and therefore may not be evaluated.

Firefighting work generally falls under the "other" category of work; however, the 0456 PCS encompasses a range of wildland fire related jobs, including those not performing the more traditional physical/hazardous aspects of wildland firefighting duties, such as Fire Management Planning Work. The work of the position to be classified meets the coverage criteria for the 0456 as a Wildland Firefighter and includes work in Aviation, Fire Management Planning, Fuels Management, Prevention, and other specialties not specifically identified in the PCS such as Training and Operations; however, at issue is determining how to evaluate work that exceeds the maximum grade level identified in the 0456 PCS.

The nature of wildland firefighting work as described in the PCS is neither clerical/administrative support nor technical in nature, which are generally characteristic of single grade interval work. Technical work is closely allied with professional work and is normally planned and managed by professional employees. It may appear very similar to professional employees in related professional fields and is performed in a narrow or highly specialized area of the overall occupation supported, requiring a high degree of practical knowledge and skill. Support work usually involves proficiency in one or more functional areas or in certain limited phases of a specific program and usually does not require knowledge of interrelationships among functional areas or organizations. Support work requires employees to follow established methods and procedures and may allow occasional development of work plans or recommendation of new procedures, but such work is typically related to the employee's individual assignment or immediate work unit.

Alternatively, the work of the position, which involves wildland fire management program assessment, aligns most closely with the administrative category. The Classifier's Handbook defines administrative work as primarily requiring a "higher order of analytical ability combined with comprehensive knowledge of 1) the functions, processes, theories, and principles of management; and 2) the methods used to gather, analyze, and evaluate information. Administrative work also requires skill in applying problems solving techniques and skill in communicating effectively both orally and in writing. <u>Administrative work often involves planning for and developing systems, functions, and services</u>; formulating, developing, recommending, and establishing policies, operating methods, or procedures; and adapting established policy to the unique requirements of a particular program."

The grade level criteria for the 0456 PCS are divided in two parts to differentiate between program management and non-program management positions. Part 1 provides grade level criteria for Wildland Firefighting Positions. This part includes various positions and specialty areas of Wildland Fire Management, specifically the Fire Management Planning Specialist. However, there only exists grade level criteria for a Fire Management Planning Specialist up to the GS-11. In evaluating the work of the position to be classified, it exceeds the work described at the GS-11 level. Part III of the 0456 PCS specifically addresses the limited grade range of the standard and reiterates that agencies are not precluded from classifying positions at grade levels above or below the grade range described in the standard. However, the PCS curiously goes on to state that "such grades are determined by extending the criteria as needed to meet specific job situations as described in the Introduction to Position Classification Standards, Primary Standard." Because the 0456 is written in narrative format, application of the Primary Standard is prohibited in both the Introduction to Classification Standards and The Classifier's Handbook, which state that the ". . . Primary Standard may be used for supplemental guidance but only in

conjunction with other FES standards". As such the Primary Standard is not an appropriate source of additional grading criteria to supplement the 0456 PCS.

Part II- Fire Management Program Elements, provides grade level criteria for Fire Management Officer positions. Fire Management Officer work involves planning, developing, implementing, coordinating, and evaluating an integrated fire management program for a segment of the organization. They provide leadership, coordination, and direction for the administration of the fire program to include but not limited to training, preparedness, detection, budget, suppression, post-fire response, fuels/vegetation management, prevention, mitigation/education, aviation, dispatching and other fire support functions, and to ensure the integration between fire and other natural resources. As Part II states "there are a number of elements common to most positions in this series which are of special significance in evaluating the complexity of individual fire management programs". The purpose of Part II is to determine the relative complexity of a program and how that impacts the difficulty of fire program management.

In defining program management responsibility, OPM Digest No. 3, dated November 1983 states that "The Office of Personnel Management has held that primary responsibility includes accountability for performance of the assigned program, e.g., planning, organizing, directing, staffing, coordinating, reviewing and evaluating the program". The work does not involve program management based on this definition and is not responsible for planning, developing, implementing, coordinating, or evaluating a fire management program for a segment of the organization. Therefore, Part II of the 0456 PCS does not provide grading criteria that is appropriate for the work of the position.

The Introduction to the Position Classification Standards directs use of an appropriate classification guide or criteria in a standard or standards for related work when there are no grade level criteria for the work. In the application of other standards, the criteria used should be for work as similar as possible to the position with respect to:

- The kind of work processes, functions, or subject matter
- The qualifications required to do the work
- The level of difficulty and responsibility; and
- The combination of classification factors which have the greatest influence on the grade level.

The Introduction goes on to state that <u>wherever possible</u> the position should be matched against classification criteria comparable in scope and difficulty, and which describe <u>similar subject matter and functions</u>. As such professional positions <u>should</u> be evaluated by professional standards, administrative work by administrative standards, and technical work by technical standards, etc.

The difficulty is in locating a comparable single grade interval standard that is reflective of the of wildland fire management program assessment work. As the work is neither technical nor administrative/clerical support in nature, the only truly relevant standards to cross compare fall into the administrative category. OPM Digest No. 08-04, dated April 1986, addresses the use of two grade interval standards to evaluate one grade interval work. This digest describes a specific scenario where one-grade administrative support work was evaluated using two-grade interval grading criteria at the GS-7 level that was intended for a two-grade interval developmental assignment. Application of the standard in this situation was deemed inappropriate by OPM due to the significant variance in qualifications required for one grade interval work vs. two grade interval developmental work. OPM states that use of two-grade interval criteria would require making adjustments to accommodate the differences in the nature of the work and related knowledges, skills, and abilities of the positions intended for coverage, compared to the position being evaluated.

However, as previously noted, Wildland Fire Management work technically falls into the category of Other, yet the work appears administrative in nature in at least 3 of the 8 specialty areas identified in the PCS: Fire Management Officer, Fire Management Planning, and Prevention. Fire Management Planning specifically describes work serving as "analysts and advisors providing program leadership and consultation" for "strategic fire management . . . planning, assessments, and interagency and/or unit . . . plans, projects, and programs . . ." Unlike the appeal scenario, this work is not developmental in nature, and Fire Management Planning work remarkably mirrors the intent of the GS-0343 Management and Program Analyst series that "primarily serve as analysts and advisors to management on the evaluation of the effectiveness of government programs and operations or the productivity and efficiency of the management of Federal agencies or both". Performance of work under the 0343 accordingly requires knowledge of the substantive nature of agency programs and activities; agency missions, policies, and objectives; management principles and processes; and the analytical and evaluative methods and techniques for assessing program development or execution and improving organizational effectiveness and efficiency, which is similar to the knowledge requirements of the position being classified.

Despite the emphasis on analytical and advisory work for Fire Management Planning under the 0456, the PCS unfortunately fails to include any reference to such knowledge by which to evaluate the work. The only appreciable knowledge that is closely related to this specialty area is "skills in planning, direction, or carrying out fire protection and prevention programs and operations". Instead, the primary focus of the 0456 knowledge requirements is on the technical aspects of wildland fire such as fire prevention and suppression, fire behavior, firefighting equipment, weather observation, etc. This is appropriate for the assignment of the series with regard to subject matter knowledge but presents a clear inconsistency in how administrative work is historically defined by OPM. This is possibly due to the inclusion of administrative wildland firefighting work with "other" work that comprises operational wildland firefighting in a PCS that does not allow the flexibility to cover both single and two-grade interval work. Based on this inconsistency, the determination has been made to apply the most reasonable classification grading criteria to the work that exceeds the highest grade of the 0456 PCS, which we have determined falls under two grade interval administrative work.

Although the 0343 provides a clear link to the administrative nature of the Fire Management Planning work, it does not contain specific grading criteria. The Administrative Analysis Grade Evaluation Guide (AAGEG) is typically used in conjunction with the 0343; however, the wildland fire management subject matter knowledge is more closely aligned with the Safety and Occupational Health Management Series, GS-0018, and less so with the narrow analytical focus of the AAGEG. The 0018 is a two-grade interval administrative series that provides a reasonable basis of comparison of related work to the fire program assessment and advisement work. The primary objective of the 0018 work is the *elimination or minimization of human injury and property and productivity losses, caused by harmful contact incidents, through the design of effective management policies, programs, or practices*. Similarly, the primary purpose of the position is to serve as a National Program Manager, providing oversight and authoritative advice and guidance in program and policy development, interpretation, and implementation to fire management agencies across the United States on all organizational levels. The work involves assessing and improving the safety, effectiveness, and efficiency of fire management programs including planning, aviation, fire operations, fuels management, and prevention. OPM appeal decision C-0081-09-04 additionally supports the application of the 0018 grading criteria to the PCS for Fire Protection and Prevention series, GS-0081, also a single-grade interval series in the firefighting field.

Overall, consideration of the 0018 includes the administrative and safety related nature of the work, the absence of more appropriate evaluation criteria, and the absence of an explicit prohibition on application of two-grade interval evaluation criteria to a single grade interval series.

Safety and Occupational Health Management Series
The personally performed work as described by this position description is evaluated by the Position Classification Standard for Safety and Occupational Health Management Series.

Factor	Comments	Level	Points
1. Knowledge Required by the Position	Level 1-7 requires comprehensive, or a wide range, of knowledge and skill in a wide range of relevant processes and procedures, sufficient to serve as a technical authority. Level 1-8 requires expert knowledge of safety and occupational health concepts, principles, laws, regulations, and precedent decisions which provide the capability to recommend substantive program changes or alternative new courses of managerial action requiring the extension and modification of existing safety and occupational health management techniques critical to the resolution of safety and occupational health management problems. Level 1-7 is met and exceeded as the incumbent advises leadership and staff at the national, regional, and field level on fire management policy and implementation strategies to ensure that intent is clearly articulated and subsequently met; and provides strategic long-range planning, leadership, guidance, coordination, and evaluation for national/regional/state wildland fire and aviation programs in the bureau and interagency community. Level 1-8 is additionally fully met as like level 1-8 the position requires expert knowledge of wildland fire behavior, wildland fire control, wildland fire planning, fuels management, and aviation management activities to recommend substantive program changes requiring the development of new, or modification of existing, wildland fire management policies and practices for the resolution of fire management problems. Reviews existing Departmental and bureau policy and procedures and identifies and assesses wildland fire and aviation management issues to evaluate overall effectiveness in meeting bureau objectives. Serves as a wildland fire management program expert and technical advisor to unit, tribal, state, regional or national office managers. Reviews, analyzes, interprets, and disseminates existing and new Departmental and bureau policy originating from the national office. Formulates, develops, and drafts new wildland fire and aviation management policy to address and/or resolve critical fire management issues related to aviation, fire operations, fuels management, and prevention. As a member of interagency committees, acts as a bureau representative to complete studies of wildland fire and aviation management issues and problems and to formulate, develop, draft, and propose wildland fire and aviation management policy. Level 1-9 is not met as the position does not require knowledge and skill sufficient to develop original concepts applicable to new or emerging agency or service-wide functions.	1-8	1550

2. Supervisory Controls	At level 2-3 the supervisor defines objectives, priorities and deadlines and provides assistance for unusual situations where precedents are unclear. Completed work at the 2-3 is reviewed for technical soundness, appropriateness, and conformity to policy and program requirements. At level 2-4 the supervisor sets the overall objectives and management resources available to achieve the expected results. The employee has responsibility for independently planning and carrying out a program or a significant assignment and resolving most conflicts. Completed work such as reports of program accomplishments are reviewed only from an overall standpoint in terms of compatibility with other activities, or effectiveness in meeting objectives. Level 2-3 is met and exceeded, and level 2-4 is fully met as the supervisor provides general work assignments in the form of objectives, goals, and priorities. Supervisor and incumbent confer on the development of general objectives, projects, and deadlines. Like the 2-4 the incumbent independently accomplishes assignments within the constraints of Bureau policy and regulations. Incumbent has considerable latitude to independently plan and carry out assigned programs and responsibilities. Like the 2-4 the incumbent keeps the supervisor informed of controversial issues, problems. Like the 2-4 completed work is reviewed only from an overall standpoint in terms of feasibility, compatibility with other work, or effectiveness in meeting requirements or expected results. Level 2-5 is not met due to the presence of technical supervision and oversight to ensure work is meeting goals accomplishing expected results.	2-4	450
3. Guidelines	At level 3-3 guidelines are available but are not completely applicable. The work assignment typically requires independent interpretation, evaluation, selection, and application of guidelines to specific situations including modifications and adaptations when necessary. At level 3-4 available guidelines tend to lack specificity for many applications such as departmental or agency policies, recent developmental results, and findings and approaches of nationally recognized organizations. The incumbent must modify and extend accepted principles and practices in the development of solutions to problems where available precedents are not directly applicable. Level 3-3 is met and exceeded as guidelines are numerous and are not completely applicable to the work. Level 3-4 is fully met as existing guidelines are in the form of regulations, manuals, instruction memoranda, legislation, and standards. Many national and regional assignments in the field of wildland fire management have guidelines that tend to lack specificity for many applications such as departmental or agency policies. Guidelines are often insufficient to deal with unique or unusual situations and the incumbent must use significant judgment and ingenuity in interpreting the intent of the guides. Creativity and innovation are required due to the wide variety of physical,	3-4	450

	biological, and socioeconomic conditions that exist. Level 3-5 is not met because although guidelines may be inadequate and contain gaps, they generally do exist but require adaptation or further development; however, they do not exist on such a broad or general scale as legislation or mission statements.		
4. Complexity	Nature of Assignment: At level 4-4 assignments cover a wide range of work operations and environmental conditions involving a substantial number and diversity of hazards; or a wide variety of independent and continuing assignments in a specialized area that have exacting technical requirements. At level 4-5 work includes broad and diverse assignments requiring innovative analysis of high safety risk activities. Level 4-4 is met and exceeded as the employee works independently and interacts with broad and diversified fire management programs throughout an interdisciplinary and interagency setting. Level 4-5 is fully met as assignments involve a wide range of duties involving high safety risk activities in wildland fire and/or aviation management. Unlike the 4-6 the incumbent is not required to originate extensive program and developmental efforts where prevailing wildland fire management issues are largely undefined. Decisions Regarding What Needs to be Done: At level 4-4 the incumbent evaluates a variety of complex, interrelated physical conditions, operating practices, and hazardous conditions. At level 4-5 the incumbent evaluates diverse hazardous work processes and conditions for a field characterized by a wide variety of problems such as extreme fluctuation in workforce assigned high safety risk jobs, large number of visitors engaged in hazardous activities, or widespread geographic dispersion of operations. Level 4-4 is met and exceeded as decisions require assessment of constantly changing hazards and environmental conditions. Level 4-5 is fully met as the incumbent must assess constantly changing hazards and environmental conditions in a field characterized by seasonal fluctuations in a workforce assigned to high safety risk jobs and widespread geographic dispersion of operations. Increased development in the wildland-urban interface, long duration fire seasons, climate change, and navigating differing expectations among partners and stakeholders have rapidly and significantly increased the complexities involved in managing responses to wildland fire and all hazard incidents. Work is further complicated by environmental situations such as: frequent critical climatic conditions which contribute to the occurrence of fires and to the difficulty, variety, and intensity of fire suppression problems; extensive mechanical and biological fuels treatments.	4-5	325

	Although complex, unlike the 4-6 determining the appropriate course of action is not contingent upon a comprehensive, penetrating analysis that requires a variety of complex tools, with progress elusive or difficult to achieve due to the lack of defined issues. <u>Difficulty and Originality</u>: At level 4-4 hazards are such that generally no single approach is adequate to control or eliminate a given problem and adaptation of proven techniques is necessary. The work typically requires interpretation of a variety of circumstances to adapt known measures to eliminate or minimize hazardous situations. At level 4-5 mitigation of dangerous conditions threatening individual safety and property requires the development of new techniques for modification of accepted specialized procedures. Level 4-4 is met and exceeded as there is generally no single approach to eliminate or control wildland fire or aviation related hazards. Level 4-5 is fully met as the external factors inherent to Interior managed wildland fire management programs such as the responsibility to mitigate impact to cultural, biological, and natural resources in a multi-jurisdictional environment often with competing priorities, require the incumbent to adapt or develop new techniques or methods, or significantly depart from established practices. Level 4-6 is not met as the work typically does not result in new concepts influencing the resolution of previously unresolved and extremely complicated wildland fire management planning issues.		

5. Scope and Effect	Scope: At level 5-3 work involves the evaluation and analysis of problems, conditions and administrative practices affecting work operations. At level 5-4 the purpose of the work is to assess the effectiveness of specific programs, projects, or functions. The incumbent plans alternative courses of specialized action to resolve issues. Level 5-3 is met and exceeded as the purpose of the position is the evaluation and analysis of problems as well as to assess the effectiveness of fire management programs. Level 5-4 is fully met as is to serve as a National Program Manager, providing oversight and authoritative advice and guidance in program and policy development, interpretation, and implementation to fire management agencies across the United States on all organizational levels. The work involves assessing and improving the safety, effectiveness, and efficiency of fire management programs including planning, aviation, fire operations, fuels management, and prevention. Like the 5-4 the incumbent formulates, develops, and drafts new wildland fire and aviation management policy to address and/or resolve critical fire management issues related to aviation, fire operations, fuels management, and prevention. Unlike the 5-5 the primary purpose of the work does not involve resolution of critical wildland fire management problems involving serious hazards of unpredictable consequences or human and property nor does it require the development of new wildland fire management guides, approaches, and methods such as those relating to fire preparedness, fuels management and prevention, fire suppression, monitoring, etc. Effect: At level 5-3 work efforts affect the adequacy of techniques applied to control or eliminate hazards and the safety of employee or the public. At level 5-4 work products impact on a wide range of agency programs. Level 5-3 is met and exceeded as the work efforts affect State/Regional level activities. Advisory decisions must consider the impact of smoke, road closures, safety of the public, and safety the workforce and may have significant negative impact on local tourism, vendors, stakeholder farming and grazing, infrastructure, cultural resources, and public perception and support of the Bureau and Department mission. Level 5-4 is fully met as the work efforts affect state/regional activities and affect the plans, goals, and effectiveness of missions of the bureau, other DOI bureaus, and DOI Office of Wildland Fire program. Various land management agencies, federal, state, tribal, local, and other government entities are also impacted by these work efforts. Like the 5-4 work efforts result in eliminating or reducing wildland fire risk and conditions throughout a large geographic region and provide employees and public visitors with a safe environment. Decisions or recommendations made by the employee may have significant negative impact on local tourism, vendors, stakeholder farming and grazing, infrastructure, cultural resources, and public perception and support of the Bureau and Department mission and may influence changes in policies or programs.	5-4	225

6. Personal Contacts	At level 6-2 personal contacts are with employees in the same agency, but outside the immediate organization. At level 6-3 Personal contacts of a non-routine nature are with a variety of individuals, including, contractors and consultants, university professors, State and local government officials, representatives of professional societies. Level 6-2 is met and exceeded as contacts include intra as well as inter-agency contacts with Forest Service, Office of Aircraft Services, Bureau of Land Management, National Park Service, Bureau of Indian Affairs, National Oceanic and Atmospheric Administration, Fish and Wildlife Service. Level 6-3 is fully met as outside agency contacts include other state, county, and volunteer fire organizations. converses regularly with interagency counterparts at the National Interagency Fire Center, various Washington Offices, and national and regional training centers, to ensure bureau involvement in interagency programs. Level 6-4 is not met as contacts are not with high-ranking officials from outside the agency such as key public and corporate executives, elected representatives, or the equivalent.	6-3	60
7. Purpose of Contacts	At level 7-2 the purpose of the personal contacts is to resolve problems by planning and coordinating activities in conjunction with supervisors and employees to control or eliminate hazards. Individuals contacted at this level are usually working toward a common goal and generally are cooperative. At level 7-3 the purpose of contacts is to influence, motivate, and encourage unwilling, skeptical, and often uncooperative individuals to adopt or comply with standards, practices, procedures, or contractual agreements. Level 7-2 is met and exceeded as contacts are for the purpose of exchanging information, coordinating work efforts and planning, identifying mutual issues, providing wildland fire and aviation management advice and guidance, integrating policies, and negotiating issue solutions. Level 7-3 is fully met as contacts involve influencing or persuading other subject matter experts to adopt a contested course of action involving technical disagreements, or to change direction on a wildland fire and aviation management issue which may conflict with a proposed objective. The incumbent must address and resolve conflicts and sensitive issues among agencies, defending, advocating, and justifying agency positions and policy interpretations on training related issues. The incumbent uses negotiation skills to persuade persons or groups to accept agency opinions or take actions related to the advancing of fire training program goals and objectives. Level 7-4 is not met as the purpose of contacts is not to justify, defend, negotiate, or settle highly significant, controversial, and often very sensitive wildland fire and aviation management issues.	7-3	120

8. Physical Demands	Level 8-1 is fully met as the work is primarily sedentary. Some physical exertion related to site visitations and fire line assignments is required. Walking on rough, uneven terrain, long periods of standing, and exposure to extreme heat, smoke, and temperatures is required. Although a level of physical fitness is required, level 8-2 is not met as such work does not involve regular and recurring physical exertion.	8-1	5
9. Work Environment	Level 9-1 is fully met as work is normally performed in an office setting. During the wildland fire season, field work may involve high risk exposure to potentially dangerous situating or stress. This involves occasional exposure to moderate risks and discomforts which usually require protective equipment to be worn. A range of safety and other precautions are required; however, level 9-2 is not met as such exposure to such hazards does not occur on a regular and recurring basis.	9-1	5
	TOTAL		3190

Grade	Point Range
GS-12	2755-3150

Summary Points
1. 1-8 = 1550
2. 2-4 = 450
3. 3-4 = 450
4. 4-5 = 325
5. 5-4 = 225
6. 6-3 = 60
7. 7-3 = 120
8. 8-1 = 5
9. 9-1 = 5
= 3190

Total points (3190) fall within the range which yields a GS-13 level.

FINAL CLASSIFICATION: The recommendation for this position is to be classified as ***Wildland Firefighter, GS-0456-13.***