POSITION EVALUATION STATEMENT

Title, Series, and Grade: Wildland Firefighter (Fire Management Planning), GS-0456-12

DOI Standard Position Description Number: DX03400

Background: This Standard Position Description (SPD) was developed by an Advisory Work Group made up of a team of fire subject matter experts and classification specialists and is representative of fire planning work performed. The major duties and responsibilities described within the SPD were identified and assigned as a result of a thorough analysis of the Wildland Firefighter, GS-0456 Position Classification Standard (PCS).

References: OPM Position Classification Standard for Wildland Fire Management, June 2022; and 5 U.S. Code § 5104, Basis for Grading Positions.

Series & Title Determination: According to the OPM's Standard for Wildland Fire Management, the 0456 series includes classes of position which involve technical and specialized work on the protection of forest or range lands and resources from fire. Fire Management Planning work involves serving as analysts and advisors providing progam leadership and consultation for short and long-term strategic fire managemnt planning, assessments, and interagency and/or unit fire management plans, projects, and programs to include but not limited to staff training planning and execution. 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, presuppession, 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.

The basic title for positions that involve technical and specialized work on the protection of forest or range lands is *Wildland Firefighter*. Parenthetical titles have been established for official use in this series. The parenthetical title, (*Fire Management Planning*) is added to further identify the duties and responsibilities performed and the special knowledge and skills needed. Therefore, this position is appropriately assigned to the 0456 series and titled as a ***Wildland Firefighter (Fire Management Planning), GS-0456.***

Grade Determination: 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, including Fire

Management Planning Work. Such work is described in the PCS as *serving as analysts and advisors providing program leadership and consultation for short and long-term strategic fire management planning, assessments, and interagency and/or unit fire management plans, projects, and programs to include but not limited to staff training planning and execution.* The work of the position to be classified meets the coverage criteria for the 0456 as a Fire Management Planner; however, at issue is OPMs inclusion of planning work in a single grade interval series.

The nature of Fire Management Planner 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, Fire Management Planner work 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. Administrative work often involves planning for and developing systems, functions, and services; 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 wherever possible 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 that is reflective of the of Fire Management Planning 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, the 0456 Fire Management Planning work technically falls into the category of Other, yet the work appears administrative in nature in its description 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 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. 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 regarding 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 "boots on the ground" 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 Management Planning 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 (Fire Management Planner) position is to serve as the regional fire planning expert for the technical analysis of the fire management planning program, providing leadership, training, and advice to wildland fire management organizations on the technical application of processes to assist in developing safe and effective fire management programs. 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.

Similar to experience requirements of a Fire Management Planner, the Individual Occupational Requirements for the 0018 include examples of specialized experience such as: developing or implementing programs to reduce the frequency, severity, and cost of accidents and occupational illnesses; designing or modifying workplaces, processes, products, or other systems to control or eliminate hazards; and work in occupational fields such as industrial hygienist, safety engineer, fire prevention engineer, health physicist, and occupational health nurse. Additionally, grades at the GS-11 level and above follow a single grade pattern regardless of the nature of the work (i.e., one grade vs two-grade interval), which allow for the same basic protocol for the qualification requirements of one year of specialized experience equivalent to at least the next lower grade level.

Overall, consideration of the 0018 includes the administrative nature of the fire management planning 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 1-6 is fully met as this level requires knowledge of the principles, methods, and techniques of wildland fire management permitting the independent performance of recurring assignments that involve plans to control or eliminate unsafe conditions as well as practical knowledge of the body of laws, regulations, policies and procedures related to wildland fire management to sufficiently interpret and explain the reasons and purposes for applying such measures to minimize or abate wildland fire hazards. Level 1-6 is additionally exceeded, and level 1-7 is fully met as the position requires comprehensive, or a wide range, of knowledge and skill in a wide range of wildland fire management planning processes and procedures, sufficient to serve as a technical authority. Like the 1-7 the employee performs complex	1-7	1250

	administrative responsibilities providing oversight and guidance in the development, implementation, and evaluation of the region/state fire management planning programs. The position additionally requires comprehensive knowledge and skill of all phases of fire management including wildland fire monitoring, prescribed fire, and fuels activities, to conduct studies, analyze results, and make recommendations. Although the incumbent serves as the regional/state fire planning expert, applying technical fire planning knowledge to analyze and resolve complex problems relating to the development, execution, and monitoring of local/region/state fire management issues, such expertise and knowledge does not provide the capability to recommend *substantive program changes* or alternative new courses of managerial action requiring the extension and modification of *existing wildland fire management activities in fire preparedness, fuels management and prevention, fire suppression, monitoring*, etc. to resolve such complex problems, or to make *significant, far reaching decisions or recommendations as it relates to DOI or NPS fire management policies*, as is characteristic of the 1-8 level. In addition to failing to meet level 1-8 as described in the standard, at the regional level the position is not commensurate with the illustrations, or the benchmarks associated with 1-8. The Primary Standard further underscores the significance of level 1-8 defining mastery of an administrative field in terms of application of experimental theories and new developments to problems not susceptible to accepted methods and making decisions or recommendations to significantly change, interpret, or develop important public policies or programs. The position does not rise to this level, as stated previously, primarily due to the presence of established wildland fire management activities as well as DOI and NPS policies and procedures combined with the lack of authority to change or develop fire management policy at the regional level.		
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	2-4	450

	requirements. Level 2-3 is met and exceeded, and level 2-4 is fully met as the supervisor and employee together develop a mutually acceptable project plan which typically includes identification of the work to be done, the scope of the project, and deadlines for completion. Like the 2-4 the incumbent independently conducts fire management analysis and planning, coordinating with others, and determining the approach to take to complete specific assignments. Like the 2-4 issues with far reaching implications such as policy questions dealing with controversial issues are reviewed with the supervisor to achieve agreement or solution. Like the 2-4 completed projects, evaluations, reports, or recommendations are reviewed by the supervisor for compatibility with organizational goals and effectiveness in achieving intended objectives. Level 2-5 is not met due to the presence of technical supervision and oversight to ensure work is meeting goals accomplishing expected results.		
3. Guidelines	Level 3-3 is fully met as guidelines are numerous and include relatively specific guidance that requires interpretation, evaluation, selection, and the exercise of judgement to apply to different situations. Such guidelines include prescribed fire and fuels treatment plans, risk assessments, natural and cultural resource plans, interagency agreements, and memorandums of understanding. However, level 3-3 is exceeded, and level 3-4 is fully met as guides range from specific to general and may be too broad or even too narrow for specific circumstances. General guidance includes agency and bureau published directives such as wildland fire/fuels operations manuals, safety regulations, handbooks, and guides. Due to this variation within the guidelines as well as the range and complexity within the assigned work, like the 3-4, available guidelines may have limited applicability or have gaps in specificity requiring the incumbent to use initiative and judgment to extend or modify them to pertain specifically to fire management planning in the region/state. 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.	3-4	450

4. Complexity	Nature of Assignment: Level 4-4 is fully met and exceeded as assignments involve a wide range of work operations and conditions covered under wildland fire management planning that include broad and diversified fire management programs throughout an interdisciplinary and interagency setting. Level 4-5 is additionally met as the work include broad and diverse assignments requiring innovative analysis of wildland fire management planning. Analyzes and resolves complex problems relating to the development, execution, and monitoring of state/region fire management issues by developing and implementing alternatives to meet the fire management social or political objectives and monitoring the effects of long-term droughts and changes in climate to analyze long-term fire related impacts on the environment. 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: Level 4-4 is fully met and exceeded as the employee evaluates various complex, interrelated wildland fire physical conditions, operating practices, hazardous interactions/interfaces, and serious mishaps; and analyzes unconventional problems or circumstances and incomplete or conflicting data. Like the 4-5 the incumbent additionally must consider and evaluate diverse hazardous work processes and environmental conditions involved in wildland fire management, of which is typically characterized by large seasonal fluctuations in the size of the workforce and widespread geographic dispersion of wildland fire operations. Such considerations include ecosystem dynamics, fuel loading, fire history, fire causes, fire danger, current and expected fire situation, resource availability, weather, smoke management issues, public safety, resources threatened, safety hazards, and costs. The incumbent must identify, evaluate, and consider these interrelated factors to develop alternative courses of action using appropriate methods and frameworks Complexity is further increased by continually evolving elements such as changes in climate that impact weather patterns, ecosystems, etc., that require further analysis to determine impact on the fire management planning process. Extensive decision making on complex topics such as data interpretation, work	4-5	325

	planning and refinement of methods and techniques is required to achieve fire management planning objectives. Like the 4-5 widespread geographic responsibility adds to the complexity of the work and the incumbent must engage in extensive collaboration and coordination to integrate planning efforts with various land management agencies, federal, state, tribal, local, and other government entities. 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>: Level 4-4 is met and exceeded, as wildland fire management planning problems require adaptation of procedures. Like level 4-5 the incumbent provides expert technical guidance and support for the full range of analytical tools used for interagency fire management planning. Analyzes and recommends enhancements to meet user needs and assesses the applicability of analytical tools to address fire management issues to develop procedures and incorporate them into unit management plans. 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	<u>Scope</u>: Level 5-3 is fully met and exceeded as the purpose of the position is to assess the effectiveness of state/regional fire management programs and fire management strategies in meeting intended goals and objectives. Serves as the regional/state fire planning expert for the analysis of the fire management planning program and to additionally assist in developing safe and effective fire management programs. Like the 5-4 the incumbent evaluates the adequacy and effectiveness of fire management programs through periodic on-the-ground inspections or visits to field units and ensures the wildland fire management programs support the achievement of land and resource management goals and objectives. The incumbent resolves problems which may present with additional challenges due to the presence of multiple	5-4	225

	agencies with differing missions and/or conflicting goals and objectives. 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: Level 5-3 is met and exceeded, and level 5-4 is fully met as 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. 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. Level 5-5 is not met as the work does not affect fire management activities both within and outside of the agency.		
6. Personal Contacts	Level 6-2 is fully met contacts included those with the national office, regional/state office, and field units. Daily contacts may include field personnel, regional/state office personnel, research scientists, other bureau personnel. However, contacts are not restricted to just employees in the same agency but outside of the immediately organization. Instead, like the 6-3, outside agency contacts include other federal, tribal, and state agencies throughout the geographic area, plus adjoining regions and/or states. private landowners, and the general public. The nature of such contacts varies from routine to non-routine such as those involved with formal presentations, interviews, informal exchanges, written reports, and correspondence. The incumbent also maintains regular personal contact	6-3	60

	with professionals and scientists involved in fire management from Federal, Tribal, State, and local agencies, universities, and professional societies. 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.		
7. Purpose of Contacts	Level 7-2 is fully met as contacts are made for determining user needs, gathering data and intelligence, and explaining proposed actions. However, level 7-2 is exceeded because like the 7-3 contacts are for the purpose of planning, implementation, and coordination of the fire management program. Contacts may involve various groups or individuals who have conflicting viewpoints and require the incumbent to gain compliance or acceptance with fire management methods and approaches through persuasion or negotiation. Level 7-4 is not met as the purpose of contacts is not to justify, defend, or negotiate highly significant, controversial, or very sensitive wildland fire management issues, nor does the incumbent represent the agency/DOI as a participant in professional conferences, hearings, etc. to develop, change, or modify wildland fire management standards or criteria with wide application and major occupational impact.	7-3	120
8. Physical Demands	Level 8-1 is fully met as the work is primarily sedentary. Work involves vehicle and aircraft travel associated with site visits and other administrative travel for meetings, program reviews, or conferences. Although a level of physical fitness is required which will allow for work during periods of extended stress, level 8-2 is not met as such work does not involve regular and recurring physical exertion requiring considerable standing, walking, climbing, bending, crouching, stretching, reaching, or similar movements.	8-1	5
9. Work Environment	Level 9-1 is fully met as most work is in the office setting. Occasionally some exposure to discomfort or risk is encountered on/during travel and site visits such as extreme heat or cold, or exposure to fire situations; 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		2815

Grade	Point Range
GS-12	2755-3150

Summary Points
1. 1-7 = 1250
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
= 2890

Total points (2890) fall within the range which yields a GS-12 level.

FINAL CLASSIFICATION: The recommendation for this position is to be classified as ***Wildland Firefighter (Fire Management Planning), GS-0456-12***

Fair Labor Standards Act (FLSA) Determination: This position does meet exemption criteria found in 5 CFR 551 and is determined to be Exempt from the minimum wage and overtime provisions of the Act.