POSITION EVALUATION STATEMENT

Proposed Title, Series, Grade: Wildland Firefighter (Fuels Management), GS-0456-12

Position Number: DOI DX04700

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 management work performed.

References: Position Classification Standard for Wildland Fire Management, June 2022; Position Classification Standard for Safety and Occupational Health Management Series, GS-0018, TS-55 August 1981.

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, 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.

This is an agency standardized position description (SPD) located in the state or regional office of a Department of Interior (DOI) wildland fire management program. The primary purpose of the position is to assess the effectiveness of fuels management programs to serve as a technical authority providing guidance, advice and support for policy interpretation and implementation to fire management agencies across the United States to all organizational levels in respective areas of expertise. The position is also a State/Region level subject matter expert in resource need forecasting and allocation. The position requires Comprehensive knowledge of wildland fire behavior, wildland fire control, wildland fire planning, fuels management, and aviation management activities sufficient to advise on and form consultative, program development, and oversight services for these programs. It also requires Comprehensive knowledge of wildland fire and fuels management planning sufficient to understand the relationship between wildland fire management and other Bureau programs to achieve long term land management and objectives. 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*. The prescribed a parenthetical title of *Fuels Management* will also be applied, which describes work that involves gathering data about fuel quantity and conditions, using firefighting skills to implement prescribed fire and mechanical thinning treatments that improve current vegetation conditions while reducing flammable materials that fuel wildfires. Therefore, this position is appropriately assigned to the 0456 series and titled as a ***Wildland Firefighter (Fuels Management).***

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, 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 wildland fire management subject matter knowledge is most closely aligned with the Safety and Occupational Health Management Series, GS-0018. 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 is to assess the effectiveness of fire management programs including operations, aviation, fuels management, prevention, planning, and training and serving as a subject matter expert providing guidance, advice and support for policy interpretation and implementation to fire management agencies. 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.

<u>Safety and Occupational Health Management Series</u>

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 requires knowledge of the principles, methods, and techniques 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 relevant laws, regulations, policies, and procedures to sufficiently interpret and explain the reasons and purposes for applying such measures to minimize or abate hazards. 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 1-6 is met and exceeded as the position requires advanced knowledge of wildland fire management, aviation management, and ICS concepts, principles, laws, and regulations, to develop or recommend substantive program changes or alternative courses of action. Level 1-7 is fully met as the incumbent advises leadership and staff at the regional and field level on fire management policy and implementation strategies to ensure that intent is clearly articulated and subsequently met. Like the 1-7 provides strategic long-range planning, leadership, guidance, coordination, and evaluation for regional/state wildland fire and aviation programs in the bureau and interagency community. Assists in the formulation of annual program budgets, regional/state accomplishment narratives, review, and recommendation of programmatic proposals, supplemental and record keeping of overall program budget. Like the 1-7 the position requires comprehensive knowledge of wildland fire behavior, wildland fire control, wildland fire planning, fuels management, and aviation management activities sufficient to form consultative, program development, and oversight services for these programs; advanced knowledge of wildland fire management, aviation management, and ICS concepts, principles, laws, and regulations, to develop or recommend substantive program changes or alternative courses of action; and Comprehensive knowledge of wildland fire and fuels management planning sufficient to understand the relationship between wildland fire management and other Bureau programs to achieve long term land management and objectives. Although the incumbent serves as the regional/state wildland fuels management program expert and technical advisor to unit, tribal, state, or regional office managers., 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 techniques* 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.	1-7	1250

	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.		
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	3-4	450

	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 complex situations relating to the development, execution, and monitoring of resource management issues and the incumbent must use significant judgment and ingenuity in interpreting the intent of the guides. 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. Assignments require analysis of unconventional problems or circumstances, inconclusive facts or data and are characterized by the uncertainty of accepted methods that are available for selection or use. 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 regarding what needs to be done includes analysis and evaluation of diverse issues and conditions involved in managing Agency responses to wildland fire and aviation management. Level 4-5 is fully met as the field of wildland fire and aviation management is broad and characterized by a wide variety of problems like the	4-5	325

	4-5 such as increased development in the wildland-urban interface; long duration fire seasons; climate change; 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; and navigating differing expectations among partners and stakeholders. 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 incumbent provides expert technical guidance and support for interagency fire management at the state/regional level. Analyzes and resolves complex problems relating to the development, execution, and monitoring of resource management issues by developing and recommending alternatives to meet resource management objectives. External factors inherent to DOI 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, significantly increases the complexity of the work performed. 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 the purpose of the work is to assess the effectiveness of fire management programs including operations, aviation, fuels management, prevention, planning, and training. 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. 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. Level 5-5 is not met as the work does not affect fire management activities both within and outside of the agency.	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	6-3	60

	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.		
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 contacts are to influence, motivate, and encourage unwilling, skeptical, and often uncooperative individuals to comply with standards, practices, procedures, or agreements. Level 7-2 is met and exceeded as contacts are for providing wildland fire and aviation management advice and guidance, integrating policies, and negotiating issue solutions. Level 7-3 is fully met as contacts are for negotiating cooperative agreements with other entities, influencing, or persuading other subject matter experts to adopt a particular course of action or to change direction on a particular issue to a wildland fire and aviation management consideration which may conflict with a proposed objective; and using negotiation skills to persuade persons or groups to accept agency opinions or take actions related to the advancing of fuels 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 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		2890

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 fall within the range which yields a GS-12 level.

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