Wildland Fire Management, GS-0456, issued June 2022

Interpretive Guidance for Applying the Position Classification Standard (PCS)

Department of the Interior – Office of Human Capital (OHC)

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General Classification Guidance

- 1. **PATCO**. The 0456 falls under the "Other" category in PATCO (Professional, Administrative, Technical, Clerical, and Other).
- 2. **Grade Progression**. The 0456 is a single grade interval series.
- 3. Classifying Grades. Part I, Fire Management Position Illustrations, is for evaluating operational fire management work and Part II, Fire Management Program Elements, is for evaluating fire program management work. For further clarification on what is meant by operational fire management work, the PCS states that the PCS is divided into two parts to "facilitate the presentation and application of grade level criteria that are different for program management and non-program management positions." Additionally, Part I states that the illustrations in this Part are to be used to evaluate "wildland firefighting positions not covered by the fire management program elements in this PCS..."
 - a. Part II may not be used to derive grades for positions in Part I. Other position classification standards should be referenced to classify grades above the GS-11 for operational fire management positions. (For more information see <u>The Classifier's Handbook</u>, "Using Grade or Factor Levels Not Described in Published Standards" and <u>Introduction to the Position Classification Standards</u>, Section II.C. "Using Classification Standards")
 - b. Part II is for evaluating Fire Management Officer (FMO) positions
 - c. Neither Part I nor Part II include benchmark illustrations for grades 8 and 10. This does not preclude establishing 0456 positions at these grades either at full performance level or as a career ladder. See Part III, question number 5, on page 52 of the PCS for further guidance.
- 4. **GSSG and GSLGEG**. Principles applicable to establishing supervisory (i.e., positions evaluated using the General Schedule Supervisory Guide (GSSG)) and lead positions (i.e., positions evaluated using the General Schedule Leader Grade Evaluation Guide (GSLGEG)) include:
 - a. It is against DOI policy (Personnel Bulletin No.18-03) and OPM guidance to grade band supervisory and lead positions.
 - b. Clear career paths must be established using sound position management principles.
- 5. **Code 4 Supervisors**. The OPM data standard definition of Code 4 Supervisor does not apply to positions classified in the 0456 occupational series. See "<u>Labor Relations</u> Guidance" for more information.

Fire Management Officer

For FMO positions, DOI has established standardized PD templates (i.e., the supervisory portion of the PD must be completed and evaluated at the bureau level, but the technical base of the PD is the DOI standardized PD template).

- 1. **FMO**. Instructions for using the DOI standardized PD templates are as follows:
 - a. Bureaus select the template that most accurately describes the fire program the FMO position manages.
 - i. Select the template that is at least 80 percent accurate in its entirety with the key factor for accuracy being "Complexity."
 - ii. Bureaus are encouraged to provide bureau guidance that provides overall bureau context of the fire programs. For example, bureau guidance could include bureau headquarter assessment of all bureau fire programs using the program characteristics in the PCS and using the definition of terms in the PCS and in the templates as follows: Moderately Complex, Complex, and Very Complex. By providing bureau-wide assessment of the bureau fire programs, the bureau can better ensure consistent application of the program characteristics and thereby ensure that the proper template is being used for the various FMO positions throughout the bureau.
 - b. Once the appropriate template is selected, the bureau must complete the "Supervisory Description and Assessment" section of the template. The GSSG table must be completed with factor descriptions. Classification must provide the factor level assessments and final position classification of the position.
 - i. Only Classifiers with delegated position classification authority may certify final position classification.
 - ii. See information regarding BUS Code under "<u>Labor Relations Guidance</u>" in this document.
 - c. An HC-08, PD Cover Page, must be completed for the final PD.
 - d. The final PD must be submitted to the OHC for special retirement coverage determination. See the FLERT website for more information.
- 2. **AFMO**. Application principles for Assistant Fire Management Officer (AFMO) positions are as follows:
 - a. GSSG Deputy Rule: As a general rule, AFMO positions would not meet the definition of Deputy in the GSSG and, therefore, would not be evaluated using the Deputy Rule (i.e., evaluated one grade below the FMO).
 - i. For the GSSG deputy rule to be applicable, the organization must be so large and so complex as to require the addition of a deputy at the head of the organization. Furthermore, the deputy position must serve as an alter ego to a manager of high-rank or level and either fully share with the manager the direction of all-phases of the organization's program and work or is assigned continuing responsibility for managing a major part of the manager's program when the total authority and responsibility for the organization is equally divided between the manager and the deputy. A deputy's opinion or direction is treated as if given by the manager. This definition excludes some positions, informally referred to as "deputy or assistant," which require expertise in management subjects but do not include responsibility for directing either the full organization or an equal half of the total organization.
 - b. AFMOs throughout the Department are a mix of supervisory and nonsupervisory positions. These positions are established based on the specific structure of the fire program and, therefore, should be evaluated on a case-by-case basis.

- c. It is possible that DOI standard position descriptions (SPD) or templates would adequately describe the work of an AFMO. In this case the AFMO role could be identified with an organizational title in FPPS and on the PD Cover Page.
- d. If the position management and organizational structure supports the use of an FMO standardized template for an AFMO position, the FMO standardized template may be used for AFMO positions.

PD Format

Positions Evaluated using the PCS

- 1. Classification Factors
 - a. Base for all positions: Guidelines, Complexity, Personal Contacts/Purpose of Contacts, Supervision Received
 - b. For Supervisory positions add: Supervision Exercised
 - c. For Lead positions covered by the GSLGEG add: Lead Authority Exercised
 - d. For Fire Management Officer positions add information under Complexity that supports evaluation of "Elements Influencing Complexity of the Fire Management Program"
- 2. Overall Format
 - a. Introduction, Major Duties, Classification Factors, Other Significant Facts which will include a description of physical demands and work environment

Positions Evaluated Using the GSSG or GSLGEG

- 1. For GSSG Add the 6 Factor Level Descriptions at the end of the PD.
- 2. For GSLGEG Add a description of Lead responsibilities to the major duties and describe the number of employees led, base level of employees led, and lead authority under the section "Lead Authority Exercised."

Positions Evaluated Using Other Position Classification Standards

- 1. If the standard is FES, add the 9 Factors at the end of the PD.
- 2. If the standard is narrative, add additional factors necessary to evaluate.
- 3. For grades 8 and 10 in the 0456: These grades are to be evaluated primarily using benchmarks from the PCS; however, the Classifier may use the primary standard to further support the PCS analysis and evaluation without having to organize the PD in the 9 Factor format. See Part III, question number 5, on page 52 of the PCS for further guidance.

Titling

1. Wildland Firefighter

- a. Position is classified using Part I of the PCS which is for Fire Management Operations.
- b. Only use the parentheticals on pages 11-12 of the PCS.
 - i. There is more specific guidance in the PCS on the use of parenthetical titling on pages 54-57.
- c. FPPS Title Code: 01 Wildland Firefighter
- d. FPPS Supervisory Status Code is 8.

2. Lead Wildland Firefighter

- a. Position is classified using Part I of the PCS which is for Fire Management Operations <u>and</u> the GSLGEG.
- b. FPPS Title Code: 02 Lead Wildland Firefighter
- c. FPPS Supervisory Status Code is 6.

3. Supervisory Wildland Firefighter

- a. Position is classified using Part I of the PCS which is for Fire Management Operations and the GSSG.
- b. FPPS Title Code: 03 Supv Wildland Firefighter
- c. FPPS Supervisory Status Code is 2.

4. Supervisory Wildland Firefighter (Fire Management Officer)

- a. Position is classified using Part II of the PCS which is for Fire Program Management and the GSSG.
- b. There can only be one FMO for the organizational component and level served.
- c. FPPS Title Code: 04 Supv Wildland Firefighter (FMO)
- d. FPPS Supervisory Status Code is 2.

5. Organizational Titles

a. OPM provides agencies the flexibility to use unofficial titles/organizational titles for advertising positions and other non-official uses.

FPPS Codes

- 1. **Special Retirement**. The following are the FPPS codes for eligible employees on positions that are covered by special retirement as determined and certified by the Office of Human Capital:
 - a. 6 CSRS Special
 - b. M FERS Special
 - c. MR FERS RAE Special
 - d. MF FERS FRAE Special

2. Special Population Code.

- a. 02 Firefighter primary/rigorous position
- b. 02A Firefighter secondary administrative position
- c. 02S Firefighter secondary supervisory

3. Special Program Identifier.

- a. An "F" code must be used for all positions within the fire program's table of organization.
- b. Bureaus may determine the "F" code to be used. However, if they are not using "F" codes for their own data collection purposes, all positions must be coded "FO" (Fire-Other).
- c. If a position is moved out of the fire program's table of organization, the "F" code must be removed. The "F" codes are only to be used for positions within the fire program's table of organization.

4. Public Safety Employee.

a. All positions covered by special retirement must be marked "yes" for this data element. Otherwise, positions are marked "no".

Internal Controls for Use of the 0456 Series

Background

Department SPDs will be used for most positions in the 0456 series. These SPDs will be issued under the policy umbrella of PB No. 20-10 *Department of the Interior/Office of Human Capital Standard Position Descriptions*. As a supplement to PB No. 20-10, the Departmental internal controls and SPD exception process specific to the 0456 PCS are described below. Following the internal controls outlined below, bureaus may establish bureau SPDs or other PDs for positions not covered by Department SPDs. Additionally, bureaus are encouraged to establish their own internal controls for use of the Department SPDs.

Internal Control

For <u>all</u> positions classified using the 0456 PCS, the following internal control procedure applies:

- 1. When a bureau determines that a position is not covered by the Department SPDs but is covered by the 0456 PCS or when a bureau evaluates a 0456 position above grade GS-13, the bureau must apply the following process to establish the position:
 - a. Requesting office compiles a documentation package to include the following:
 - i. PD that follows the PD Format outlined in DOI Interpretive Guidance.
 - ii. Position classification evaluation statement of the PD.
 - iii. Written statement by the bureau requesting the following:
 - 1. An exception to PB No. 20-10. The supervisor provides written explanation as to why the PD is not covered by a current Department SPD with a concurring statement by the bureau Fire Director, or
 - 2. A validation of the position classification determination of the PD. This is to ensure the PD is covered by the 0456 and the grade of the position has been appropriately evaluated.
 - iv. Organization chart showing the organizational context of the position.
 - b. Bureau Classifier, through the Bureau Fire Director, submits the documentation package to the Department's Office of Human Capital (OHC) through the Office of Wildland Fire (OWF). Submit requests via the Document Tracking System (DTS)
 - c. OWF and OHC will work collaboratively to provide a response back to the requesting bureau with OHC providing the final decision.
- 2. Once the bureau receives the decision back from OHC, they may:
 - a. Proceed with establishing the PD if OHC validated/concurred with their request. They must attach the written approval to the PD for accountability review purposes. The final PD must be submitted to the OHC for special retirement coverage determination. See the FLERT website for more information.
 - b. Proceed with establishing the position using the SPD that OHC determined was the most appropriate fit for the position if OHC disagreed with the SPD exception request or proceed with re-classifying the PD if OHC did not validate the requested position classification determination.

General Staffing and Qualifications Guidance

General Qualifications

The 0456 series is considered a PATCO-Other series. Experience, education, and training requirements for qualifications for the 0456 series are as follows:

GRADE	EXPERIENCE: General	EXPERIENCE: Specialized	EDUCATION/TRAINING
GS-3	6 months		1 year of related education or training
GS-4	6 months		2 years above high school with related course work
GS-5	None	GS-4	4-year course of study above high school leading to a bachelor's degree
GS-6 and above		1 year equivalent to at least next lower grade level*	None

Grade Skip for Supervisory Career Ladders with Gaps

Qualifications. The 0456 is a single grade interval series. In most cases, applicants must possess one year of specialized experience equivalent to at least the next lower grade level in the normal line of progression, with the exception of the qualifications requirements listed below. Per OPM's <u>General Schedule Operating Manual</u>, when "there is no position in the normal line of progression in an organization that is one grade lower than the position being filled...1 year of specialized experience at the second lower level is creditable for inservice applicants." For application to the 0456 series, the term "organization" refers to the listed categories outlined below (i.e., "limited or moderately complex" and "complex or very complex," as defined in the 0456 PCS):

- Within limited or moderately complex fire organizations as specified in the 0456 PCS, there is not a naturally occurring GS-10 supervisory position within the natural line of progression within the 0456 series. Therefore, one year of specialized experience in a GS-09 wildland fire position can be considered to satisfy the experience requirements for the GS-11 Fire Management Officer position for inservice applicants. For outside applicants (i.e., those without current or prior Federal competitive or excepted service), one year of specialized experience equivalent to the GS-10 level is required for the GS-11 Fire Management Officer position. For example, candidates from within Interior or Forest Service with at least one year of specialized experience in a GS-09 supervisory wildland firefighter position in a limited or moderately complex fire organization would qualify for a GS-11 Fire Management Officer position.
- Within complex or very complex fire organizations as specified in the 0456 PCS, there is not a naturally occurring GS-09 supervisory position within the natural line of progression within the 0456 series (the first level supervisor is a GS-08

supervisory position and the second level supervisor is a GS-10 supervisory position). Therefore, one year of specialized experience in a GS-08 wildland fire position can be considered to satisfy the experience requirements for the GS-10 supervisory wildland firefighter position for in-service applicants. For outside applicants (i.e., those without current or prior Federal competitive or excepted service), one year of specialized experience equivalent to the GS-09 level is required for the GS-10 supervisory wildland firefighter position. For example, candidates from within Interior or Forest Service with at least one year of specialized experience in a GS-08 supervisory wildland firefighter position in a complex or very complex fire organization would qualify for a GS-10 supervisory wildland firefighter position.

Interagency Fire Program Management (IFPM) Qualification Standards

Interagency Fire Program Management (IFPM) qualifications must be applied by HR Practitioners as set forth by each wildland fire IFPM position category (e.g., Senior Firefighter, Unit Fire Program Manager, Wildland Fire Operations Specialist, etc.). The qualifications are outlined and specified in each job opportunity announcement in order to provide applicants clear expectations of what each respective National Wildfire Coordinating Group (NWCG) is required for the position.

Applicants must submit proof by way of their Incident Qualifications and Certification System (IQCS) record, or other acceptable documentation, to show that they meet the IFPM requirements. If an applicant does not meet the required NWCG qualifications for said IFPM position, or fails to provide proof, then they would then automatically be screened out from the rating/ranking process.

For more information, please visit: https://www.nifc.gov/programs/interagency-fire-program-management/ifpm-standard

Compensation

FLSA

Fair Labor Standards Act (FLSA) determinations are to be made following Departmental policy outlined in PB No 21-06 Fair Labor Standards Act Overtime Pay Entitlement, including the use of the FLSA Worksheet and Worksheet Instructions. Of particular note, the exemption status of an employee temporarily performing different work or duties must be determined as described in §551.211; refer to this section of 5 CFR when addressing the effect of performing different work or duties for a temporary period of time on FLSA exemption status.

Labor Relations Guidance

BUS Codes for Supervisory Wildland Firefighter Positions

Implementation of the PCS requires a determination of the appropriate bargaining unit status (BUS) code for Wildland Firefighter positions performing supervisory duties.

Under Section 7103(a)(10) of the Federal Service Labor-Management Relations Statute, to be exclude from bargaining unit coverage firefighters must spend a preponderance of employment time (over 50%) exercising supervisory authority that requires the consistent exercise of independent judgement. Employment time focuses on the time spent in work activities. Therefore, a careful case-by-case analysis of the supervisory duties performed during employment time is necessary to determine if the position is excluded from bargaining unit coverage. These determinations should be made in collaboration and consultation with the applicable bureau labor relations office. Bureau labor relations offices can also provide guidance to determine if other statutory exclusions may apply.

OPM Data Standard Code Definition – Code 4 Supervisor Logic Train

- 1. **Code 4 Supervisor Reference Information**. (Information pulled from internet on 01/24/2023):
 - a. <u>Definition of Code 4 Supervisor</u>: Supervisor (CSRA). Position meets the definition of Supervisor in 5 U.S.C. 7103(a)(10) but does not meet the minimum requirements for application of the General Schedule Supervisory Guide. This code does not apply to Senior Executive Service (SES) positions.
 - b. Definition of supervisor in 5 U.S.C. 7103(a)(10): "supervisor" means an individual employed by an agency having authority in the interest of the agency to hire, direct, assign, promote, reward, transfer, furlough, layoff, recall, suspend, discipline, or remove employees, to adjust their grievances, or to effectively recommend such action, if the exercise of the authority is not merely routine or clerical in nature but requires the consistent exercise of independent judgment, except that, with respect to any unit which includes firefighters or nurses, the term "supervisor" includes only those individuals who devote a preponderance of their employment time to exercising such authority;
 - c. <u>Definition of firefighter</u>: "firefighter" means any employee engaged in the performance of work directly connected with the control and extinguishment of fires or the maintenance and use of firefighting apparatus and equipment;
 - d. <u>Definition of Code 2 Supervisor</u>: Supervisor or Manager. Position requires the exercise of supervisory or managerial responsibilities that meet, at least, the minimum requirements for application of the General Schedule Supervisory Guide or similar standards of minimum supervisory responsibility specified by position classification standards or other directives of the applicable pay schedule or system. This is also the code most commonly used for Senior Executive Service (SES) positions.
 - e. GS-0456 Occupational Series Definition: This series includes positions that supervise or perform work to manage and extinguish fires and involves technical and specialized work in the planning and the execution of Wildfire management programs in fire adapted ecosystems while dealing with problems of smoke dispersion, and hazard reduction near urban areas. This includes, but is not limited to, fire prevention, pre-attack planning, wildfire suppression, post suppression, fire research, and other specialized work relating to fire management programs. (page 10)

2. Connecting the dots.

a. The definition of Code 2 Supervisor is the GSSG or other classification standards (i.e., it's a Position Classification definition). The definition of a Code 4 Supervisor is in U.S.C. for purposes of Federal Labor-Management Relations, and not for purposes of Position Classification.

- b. Wildland Firefighters (0456) meet the firefighters definition.
- c. Firefighters must spend a preponderance of their time exercising supervisory authority in order to meet the definition of "supervisor" for the purposes of 5 U.S.C. 7103(a)(10).
- d. Preponderance of time in legal terms means at least 51 percent.
- e. Firefighters spending at least 51 percent of their time exercising supervisory authority would be covered by the GSSG and would be covered as supervisors for purposes of Federal Labor-Management Relations. If positions are covered by the GSSG, they meet the OPM data standard definition for Code 2 supervisors.
- 3. **Conclusion**. The OPM data standard definition of Code 4 Supervisor does not apply to positions classified in the 0456 occupational series.