

Wildland Fire Management, GS-0456

Interpretive Guidance for Applying the Position Classification Standard (PCS)
Department of the Interior – Office of Human Capital (OHC)

Introduction

This guidance has been updated and supersedes the Interpretive Guidance issued in August 2023 for the [GS-0456 Wildland Fire Management occupational series](#). It has been updated to clarify procedures for use of the GS-0456 series within the Department of the Interior (DOI) and to provide supplemental direction on the use of standard position descriptions (SPD) developed for this series.

General Classification Guidance

1. **PATCO.** General Schedule (GS) positions are divided into five categories of work commonly referred to as PATCO (Professional, Administrative, Technical, Clerical, and Other). The PATCO designation describes the general characteristics of work classifiable under the GS and reflects the typical grade level patterns for a particular occupation. The GS-0456 Series is within the “Other” category, occupations that do not clearly fit into the others.
2. **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. In the GS position classification system established under [5 U.S.C., Chapter 51](#), the positions in the 0456 are one-grade interval positions.
3. **Occupational Information.** Part I – is intended for use in evaluating Wildland Firefighting positions in the Wildland Fire Management, 0456, series. It provides series definitions, titling instructions, and detailed occupational information for this PCS.
 - a. **General Series Determination Guidelines** – The series determination for this occupation is based on the primary work of the position, the highest level of work performed, and the paramount knowledge required to do the work. Refer to additional series determination guidelines on page 7 of the PCS.
 - b. **Official Titling Provisions** – The basic title for positions that involve wildland firefighting operations is *Wildland Firefighter*.
 - i. The Office of Personnel Management (OPM) has established parenthetical titles for official use in this series. Parenthetical titles may be used with the basic title to further identify the duties and responsibilities performed and the special knowledge and skills needed. Agencies may use a combination of two parenthetical specialty titles in official position titles where the two are of significant importance to the position. The following parenthetical titles are prescribed for the Wildland Fire Management series:
 - Aviation
 - Fire Engine Operation
 - Fire Management Officer
 - Fire Management Planning

Fuels Management
Helitack
Prevention
Smokejumper

ii. Supervisors and Leaders – OPM allows the basic title to be appended with one or more of the following prefixes and/or suffixes:

- Add the prefix “Supervisory” to the basic title when the agency classifies the position as supervisory. If the position is covered by the General Schedule, refer to the [General Schedule Supervisory Guide](#) (GSSG) for additional titling and grading information. For supervisory and nonsupervisory positions that include managing the total internal fire management function for an agency, bureau, service, installation, or other organization, there can be only one Wildland Firefighter Officer for the organizational component and level served. Do not use the prefix, “Supervisory” in conjunction with this title, although the position may satisfy the definition of “supervisor” in the GSSG. Titles such as Officer (e.g., Wildland Firefighting Officer), Administrator, or Manager (e.g., Wildland Firefighting Manager) may be substituted to denote a level of responsibility which inherently includes supervision ([Introduction to Position Classification Standards](#), page 15).
- Do not add the prefix “Supervisory” to the basic title when the agency classifies the position based on “technical work” and supervisory duties performed are 20% or less of the time, i.e., Code 4 Supervisor.
- Add the prefix “Lead” to the basic title when the agency classifies the position as leader. If the position is covered by the General Schedule, refer to the [General Schedule Leader Grade Evaluation Guide](#) (GSLGEG) for additional titling and grading information.

iii. Organization Titles – OPM allows agencies to establish organizational and functional titles for internal administration, public convenience, program management, or similar purposes. Organizational and functional titles do not replace but complement official position titles. Examples of organizational titles are Branch Chief, Superintendent, Engine Captain, and Division Chief. Examples of functional titles are Chief of Fire Management and Chief of Fire Operations.

4. **Grading Information.** Part II – There are many possible ways of presenting, for purposes of analysis and classification, the essential characteristics of work. For this reason, classification standards and guides have different formats and include a variety of evaluation elements. This PCS is written in a narrative format describing the nature of work and level of responsibility for each grade covered by the standard. This requires the user to look at work as a whole and select the most appropriate overall grade. Although each grade level is not described individually, the pertinent factors are described in terms of duties and responsibilities at each level where they are of particular significance. The classification factors include the Guidelines; Complexity; Personal Contacts/Purpose of Contacts; Supervision Received; Supervision Exercised; and Elements Influencing Complexity of Fire Management Program. These classification factors are of significance in classifying positions in this series, however some of the criteria described may not apply to all positions.

5. **Classifying Grades.** The grade level criteria for the Wildland Firefighting Series are divided in two parts to facilitate the presentation and application of grade level criteria that are different for program management and non-program management positions. Part I of the standard provides grade level criteria for Wildland Firefighting positions describing typical duties and responsibilities common to various positions and specialty areas of Wildland Fire Management. Part I Fire Management Position Illustrations, the final step in the evaluation of wildland firefighting positions not covered by the fire management program elements in the standard include using the occupation and specialty-specific factor illustrations as a frame of reference for applying factor level concepts. Use the illustrations to gain insights into the meaning of the grading criteria. The level of work described in some illustrations may be higher than the threshold for a particular factor level. If the factor information in the position description fails to fully match a relevant illustration, but does fully match the criteria, the level may still be assigned. Part II of the standard provides grade level criteria for Fire Management Officer positions which define and describe in degrees of difficulty the criteria for fire management positions. Part II Fire Management Program Elements are especially important in reflecting more specifically the nature and variety of work and other pertinent factors. While it is true that most fire management positions will involve considerations of these elements, the degree to which they are present often varies significantly. In view of this, degrees of each of these elements are described as an aid in determining the relative program complexity and level of position. The elements when considered collectively illustrate “Fire Management Programs of Limited Complexity,” “Moderately Complex Fire Management Programs,” and “Complex Fire Management Programs.” Additional evaluation criteria may be applicable for classifying positions with lead, supervisory, and/or managerial duties and responsibilities and for non-lead, non-supervisory, and non-managerial positions where OPM did not include benchmarks and illustrations.
- a. OPM’s GSLGEG, Part 1 is used to classify positions of work leaders who, as a “*regular and recurring*” part of their assignment, *lead three or more employees* in one-grade interval occupations, which includes the Wildland Firefighter series, in the GS in accomplishing work. Work leaders also perform work that is the same kind and level as that done by the team lead. Leaders are responsible to their supervisor for ensuring that the work of the team is carried out by performing such duties as outlined within the GSLGEG, pages 2 and 3. For grade determination purposes, the leader positions are classified one GS grade above the highest level of nonsupervisory work led.
 - b. OPM’s GSSG is used to grade GS supervisory work and related managerial responsibilities that: 1) require accomplishment of work through combined technical and administrative direction of others; and 2) constitutes a major duty occupying at least 25 percent of the position’s time; and 3) meet at least the lowest level of Factor 3, Supervisory and Managerial Authority Exercised, in this guide, based on supervising civilian employees, volunteers, or other noncontractor personnel. For position classification purposes, a supervisor is defined as a position or employee who accomplishes work through the direction of other people and meets at least the minimum requirements for coverage under this Guide. A first level supervisor personally directs subordinates without the use of other, subordinate supervisors. A second level supervisor directs work through one layer of subordinate supervisors. A “full assistant” shares fully with a higher-level supervisor in all phases of work direction, contractor oversight, and delegated authority over the subordinate staff.
 - i. For position classification purposes under this Guide, a managerial position is defined as a position or employee who possesses the authority to direct the work of an organizational unit; is held accountable for the success of specific line or staff

functions; monitors and evaluates the progress of the organization toward meeting goals; and makes adjustments in objectives, work plans, schedules, and commitment of resources. Such positions may serve as head or assistant head of major organization, as described in [5 U.S.C. 5104](#).

- ii. In addition, some other standards for specific occupational series provide criteria for classifying supervisory and program management work. Not all standards, however, which cover program management work also measure the difficulties and responsibilities of supervising people.
 - iii. To classify a supervisory or program management position in any occupational series, classifiers should: apply criteria for measuring program management work as provided in the standard for the series to which the position is classified or in related standards or guides which measure program management duties and responsibilities and apply the supervisory classification guide to positions whose supervisory and/or managerial duties and responsibilities meet minimum requirements for coverage by the guide.
6. **Code 4 Supervisors.** Code 4 supervisory work that fails to meet OPM requirements for coverage by the GSSG falls under [5 U.S.C. 7103\(a\)\(10\)](#) for purposes of Federal Labor-Management Relations and representation for inclusion/exclusion in a bargaining unit. See [Labor Relations Guidance](#) on page 11 for more information.

For position classification purposes and performing agency's mission, management has the right to assign work, [5 U.S.C. 7106\(b\)](#). Per consultation with OPM and the Department's Office of the Solicitor, Code 4 supervisors may be utilized to perform wildland firefighter work assignments which fail to meet coverage of the GSSG.

Servicing Human Resource Offices (SHRO) and organizations should also consider the use of lead duties instead of Code 4 supervisory duties. Supervisors normally have overall accountability for planning, scheduling, directing, evaluating, and ensuring quantity and quality of work. Lead duties complement and help supervisors ensure work assignments of the team are carried out (see Part I of the GSLGEG for a range of common one-grade interval lead duties). Lead duties that fully meet coverage of Part I may be titled as a formal "Lead" and classified one-grade level above the highest level of work led. SHRO's and organizations should thoroughly discuss and analyze needs in determining the most efficient and appropriate options for firefighter leadership work assignments, in accordance with sound position management and classification principles.

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, while 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 which appropriately captures the preponderance of major duties performed 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 “[Labor Relations Guidance](#)” on page 11 for more information.
 - 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. **Instructions for Usage of Departmental Templates in Support of FMO positions.** The templates are to be utilized as a “structural illustration” when composing FMO PDs. Fire community management officials and support staff are strongly encouraged to partner with Servicing Bureau HR Classification Specialist(s) when utilizing templates and developing a final draft PD. The Bureau Classifier will conduct a position management and classification analysis by reviewing the official organization chart to ensure FMO position(s) AND subordinate positions’ structure meets the intent of the GSSG prior to rendering final title, series, and grade determination. The Bureau will assign the PD number. Departmental templates should only be utilized if they are an appropriate fit for the organization.
3. **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 GS-0456 Classification Standard

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 non-supervisory positions where OPM did not include benchmark/illustrations for grades within the 0456, the Classifier may use the following: [Introduction to Position Classification Standards - Appendix 3 - Primary Standard](#), [5 U.S. 5104 - Basis for Grading Positions](#), and other relevant classification standards and guides for cross-series comparison purposes.

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 [Personnel Bulletin \(PB\) 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

1. When a bureau determines that a position is not covered by the Department SPDs but is covered by the 0456 PCS, when a bureau evaluates a 0456 position above grade GS-13, or when a bureau modifies a Department SPD to include Leader work assignment (in a situation where the Leader assignments do not impact official title OR grade of the SPD), the following internal control procedures apply:
 - a. Requesting office compiles a documentation package to include the following:
 - i. Proposed PD in the appropriate format as outlined within this Guidance.
 - ii. Classification evaluation statement for the proposed PD.
 - iii. Written statement by the bureau requesting exception to PB No. 20-10, the supervisor's written explanation as to why a current Departmental SPD is not applicable, and a concurrence statement by the bureau Fire Director.
 - iv. Official signed and dated organizational chart showing all positions within the organization entity.
 - 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. If non-concurrence with proposed PD exception request, use the Department SPD which most appropriately covers the work of the position.
3. Procedures for using the Supervisory SPDs are provided:
 - a. The Department has exercised delegated classification authority and approved SPDs (issued in March 2023) for: Supervisory Wildland Firefighter positions at grades GS-08 and GS-09 (first-level supervisors), and GS-10 (second-level supervisors). The use of these supervisory SPDs is contingent upon 1) the administrative and managerial duties performed meet the intent of the GSSG for position classification and 2) the official organization chart and subordinate structure thereof meets the agency's position management policy requirements, including the minimum of one (1) to four (4) supervisor-to-subordinate employee ratio. The major duties performed by supervisory and subordinate employees must be on a "regular and recurring" basis and may be performed in a continuous, uninterrupted manner, or at recurring intervals.
 - b. When determining the base level of work supervised (GSSG, Factor 5), consider all *filled and authorized positions* under the technical and administrative direction of the supervisor. The workload of a part-time or seasonal position should be prorated according to its full-time equivalent, i.e., two 20 hours positions are the full-time equivalent of one 40 hours position. In situations where subordinate staff is in training, the full-performance level (target grade) of the work would best reflect the level of the work supervised over time. In this instance, the constructed grade would be the target grade.
 - c. Fire management officials are advised to partner with Bureau's Servicing HR Classification Specialist prior to initiating personnel actions for recruitment to ensure appropriateness in use of SPDs. HR Staffing/Recruitment Specialists are also encouraged to collaborate with HR Classification Specialists prior to utilizing SPDs in support of personnel action requests.
 - d. When evaluating Code 2 supervisory and managerial authority exercised (GSSG, Factor 3) for crediting Level 3-3b, OPM's intent of Level 3-3b is that the organization structure is large and/or complex enough to require at least two subordinate Code 2 Supervisors, [OPM Digest 22, Article 03 Issue](#).

[Classifiers' Instructions for GSSG Base Level Calculations - 25 percent "at or above"](#)

This is an often-misunderstood concept because 25 percent "at or above" to determine base level of work supervised in the GSSG is not the same as the 25 percent rule to determine grade-controlling duties for nonsupervisory work. In the GSSG, base level of work is not a determination of the highest grade that comprises 25 percent or more of the workload. It is a determination of the grade at which 25 percent of the workload is either at that grade or above that grade. This process requires the classifier to conduct a detailed analysis of all subordinate position descriptions prior to rendering the final base level determination.

Definition of Full Time Employee (FTE): Workload is synonymous with workhours. FTE is equivalent to 2,087 annual workhours (12-month work cycle)/40 weekly workhours per annual. The employee(s) makes up a full-time schedule (e.g., two half-time employees are counted as one full-time employee, or any number of employees whose collective time is equivalent to one full-time employee, such as three seasonal workers who work only four months a year).

[Classification Advisory Guidance for Utilizing DOI Supervisory Templates](#)

Each Bureau SHRO has been granted full delegated classification authority over HR operational

initiatives and practices within their servicing Bureau and is accountable to the Department for justifying and defending title, series, grades, and BUS code determinations of position descriptions. Bureau SHRO is also accountable to the Policy Strategic HR Planning and Evaluation Division during Agency Oversight and Accountability Audit Investigations.

Bureau HR Classification Specialists are advised to use sound Position Management Principles to ensure supervisory position descriptions appropriately meet OPM's mandates as outlined within the General Schedule Supervisory Guide (GSSG), particularly when assessing official organization charts and validating title, series, grades determinations, while also ensuring the sufficiency in base-level of subordinate positions (employees) within each supervisory position's chain-of-command structure. Position management and structure of subordinate positions of an individual supervisory position control the final grade level of the supervisor's position.

When utilizing the Supervisory Sample Template(s) as a base, Policy advises SHRO to coordinate with supervisory officials and ensure OOC(s) accommodates the Supervisory PD(s) when the SF52 personnel action request(s) is submitted to Bureau SHRO for action. The OOC(s) should be signed by Senior Supervisory Official who possess budgetary authority over Fire organization positions and funding allocations.

Since final title and grade determinations of supervisory positions are based primarily on the design of the organizational structure, Bureau Classifiers are advised to compare official organization charts (OOCs) and subordinate employees' data to FPPS HR database system data for consistency requirements.

The final supervisory PD and support documentation should be coordinated directly to the Department's HR Specialist, Division of Workforce Relations, Office of Human Capital to coordinate special retirement coverage (FLERT).

Staffing and Qualifications Guidance

General Qualifications

The 0456 series is considered a PATCO-Other series. See the [OPM position qualification standard](#) for experience, education, training, and medical requirements applicable to the 0456 series.

Staffing Rule - Line of Progression (Promotion)

Normal line of progression is the pattern of upward movement from one grade to another for a position or group of positions in an organization. In accordance with OPM qualifications policy regarding normal line of progression, also known as promotion, there may be instances where there is not an established position one grade lower in the "normal line of progression" to be filled. In such instances, for internal placement actions only, one year of specialized experience equivalent to the *second lowest level* within the organization is credible. For external applicants, those outside without current or prior Federal competitive or excepted service, one year of specialized experience equivalent to at least the next lower level is required.

The 0456 is a unique single-grade interval series where work is limitedly classified at certain grade levels, particularly at the GS-10 level for non-supervisory positions in which work has not previously existed within the organization at the level nor does classifiable work currently exist at that level. In accordance with [5 CFR Subpart F, Time-In-Grade Restrictions](#), a candidate may only be promoted non-competitively more than one grade level within a 52-week period via career ladder promotion when the

position at the next lower grade in the normal line of progression does not exist within the organization or via exclusions included in [5 CFR 300.603\(b\)](#). Promotions without further competition of an employee hired into an assignment intended to prepare the employee for the position being filled (i.e., career ladder positions) must be made in accordance with [5 CFR 335](#), including documenting the intent to promote, the promotion plan, and normal line of progression for the position (when applicable).

Additional Information and Illustration

If a position to be filled is non-supervisory, the organizational entity is the unit under the immediate supervisor of the position to be filled. Within this entity, any position “one grade lower” than the position to be filled is in the normal line of progression – if the experience in the subordinate position is qualifying for the position to be filled.

Though a position may exist in the next lower level within an organization, the position must also be qualifying for the position to be filled. If it is not, then a second lower graded position may be used.

Example

To qualify for a GS-0456-11 position (at least 1 year of equal or equivalent experience) the specialized experience requirement can be met by qualifying experience at the second lower grade level (GS-09), *since no intervening GS-10 level positions exist in the “normal line of progression”* for this occupation in this organization/location. Likewise, a position may be filled at the GS-9 grade level with a full performance level at the GS-11 grade level. If there is no intervening GS-10 level position in the normal line of progression, the employee may be promoted without further competition to the GS-11 grade level after meeting time-in-grade requirements at the GS-9 grade level and achieving a performance rating of “Fully Successful” (level 3) or higher, per [5 CFR 335.104](#).

If a position to be filled is supervisory, the organization entity is the unit directly under that supervisory position. Within this entity, any position one grade lower and directly subordinate to the supervisory position is in the normal line of progression, if the experience in the subordinate position is qualifying for the position (e.g., a Unit Manager position is vacant, the positions within that Unit constitute the organizational entity, or a Section Chief position is vacant, the positions within that section constitute the organizational entity). For example, internal applicants meeting the specialized experience and time-in-grade requirements at the GS-8 level may be considered qualified for a GS-10 level vacancy if there is not an intervening GS-9 position within that Unit.

Exclusion of Departmental GS-10 SPDs

The Department has made the decision to not establish GS-10 non-supervisory departmental wildland firefighting SPDs due to the lack of classifiable work within that series at that grade level. However, Bureaus may consider the establishment of GS-10 non-supervisory positions in accordance with sound position management and classification principles. Establishment and use of such positions must adhere to the internal control procedures for the GS-0456 series outlined earlier within this document.

Non-Competitive Promotion - Application of New Classification Standard

Under [5 CFR 335.103\(c\)\(2\)\(i\)](#), competitive procedures for promotions do not apply to “a promotion resulting from the upgrading of a position without significant change in the duties and responsibilities due to issuance of a new classification standard...” Bureau SHRO’s should work closely with managers and supervisors during implementation of the PCS and SPDs to establish an internal process for identifying current wildland firefighting positions and incumbents impacted. OPM’s [Guide to Processing Personnel Actions](#), Chapter 14 - Promotions; Changes to Lower Grade, Level or Band;

Reassignments; Position Changes; and Details (Natures of Action 702, 703, 713, 721, 730, 731, 732, 740, 741, 769, and 770) must be followed for the processing and documentation of promotions as part of implementation. Promotions involving the upgrading of a position as a result of the implementation of a new or revised OPM classification or job grading standard or classification guide is addressed in Table 14-B, Rule 8.

Firefighter Supervisors and Managers should submit request packets to their servicing HR Classification Specialists for position classification audit and internal review processing procedures. The major duties and responsibilities performed by employees in their current positions will be evaluated under the requirements of the new classification standard to determine impact on title, series, and grade.

Bureaus are required to report all non-competitive promotions approved under this provision to the Department by the end of FY 2023. The Department will provide a spreadsheet for bureaus to use to ensure consistent reporting and tracking.

Interagency Fire Program Management (IFPM) Qualification Standards

In accordance with [Interagency Fire Program Management \(IFPM\) Qualification Standards](#), 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 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.

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 [5 CFR 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.

Position Classification and Legal Interpretation

FLSA for First Level Supervisory Wildland Firefighter Positions

The agency has certified two Standardized Position Descriptions (SPD) for first level Code 2 Supervisory Wildland Firefighters: position number DX00700, Supervisory Wildland Firefighter, GS-0456-08 and position number DX00800, Supervisory Wildland Firefighter, GS-0456-09.

A thorough position classification, compensation, and legal analysis was conducted for the above SPDs to determine whether the primary duties performing fire suppression assignments along with 25% supervisory functions are exempt from the minimum wage and overtime provisions of the Fair Labor

Standards Act of 1938 pursuant to the bona fide executive capacity exemption under 29 U.S.C., Section 213(a)(1). The analysis does not concern any wildland firefighters classified in 0081 occupational series; there has been no decision to establish an alternative work period under Section 7(k) of the Fair Labor Standards Act, 29 U.S.C., Section 207(k), and there is no contention that any other exemption under 29 U.S.C., Section 213 applies.

The Office of Personnel Management (OPM), Title 5, Code of Federal Regulation, Part 551 regulations are not the exclusive reference for determining coverage under the FLSA. When enacted, the FLSA did not originally apply to the Federal Government. Rather, Congress codified OPM regulations governing federal overtime pay under Part 550 of Title 5, CFR. OPM's executive, administrative, and professional exemption criteria are consistent with the Department of Labor's (DOL) exemption criteria." 5 C.F.R. § 551.101(c). OPM regulations further explain that an employee's position is presumed to be FLSA nonexempt unless the employing agency correctly determines that the employee clearly meets the requirements of one or more of the exemptions." 5 C.F.R. § 551.202(a). Those regulations also state that an exemption criterion must be narrowly construed to apply only to those employees who are clearly within the terms and spirit of the exemption," 5 C.F.R. § 551.202(b), noting that, if, there is a reasonable doubt as to whether an employee meets the criteria for exemption, the employee will be designated FLSA nonexempt. OPM also published new regulations governing pay for federal employees under Part 551 to bring federal pay rules into compliance with the requirements of the FLSA. The DOL defines the terms of executive, administrative or professional criteria, and OPM administers the provisions of FLSA in 29 USC; therefore, OPM regulations administering the FLSA to federal employees must assure consistency with the meaning and scope established by DOL regulations.

The Fair Labor Standards Act of 1938, 29 U.S.C., Section 213(a)(1) governs that the general rule for executive employees is those whose primary duty is management of the enterprise in which the employee is employed or of a customarily recognized department or subdivision; who customarily and regularly directs the work of two or more other employees, and who has the authority to hire or fire other employees or whose suggestions and recommendations as to the hiring, firing, advancement, promotion, or any other change of status of other employees are given particular weight. DOL further defines "primary duty" to mean "the principal, main, major, or most important duty that the employee performs." Determination of an employee's primary duty must be based on ALL the facts in a particular position, with the major emphasis on the character of the employee's job as a whole. Factors to consider when determining the primary duty of an employee include, the relative importance of the exempt duties as compared with other types of duties; the amount of time spent performing exempt work; the employee's relative freedom from direct supervision; and the relationship between the employee's salary and the wage paid to other employees for the kind of nonexempt work performed by the employee.

[Agency FLSA Conclusion for First Level GS-08 and GS-09 Supervisory Wildland Firefighters](#)

The consideration that an executive employee primarily performing management duties, at a minimum, raises more than reasonable doubts as to whether Code 2 GS-08 and GS-09 first level supervisory wildland firefighters who primarily perform fire suppression duties and devote approximately 25% of their work to supervisory duties are "executive employees" under OPM regulations. Therefore, as there is clearly more than "reasonable doubt as to whether an employee meets the criteria for exemption, OPM regulations require employees to be designated FLSA nonexempt, 5 C.F.R. § 551.202(d).

Both the DOL and OPM regulations clearly indicate that Code 2 first level GS-08 and GS-09 supervisory wildland firefighter positions which perform fire suppression duties and devote approximately 25% of their time performing supervisory duties **do not meet** the criteria to be exempt

from the minimum wage and overtime provisions of the FLSA executive exemption under 29 U.S.C. Section 213(a)(1).

Final Agency FLSA determination: Nonexempt.

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 [5 U.S.C. 7103\(a\)\(10\)](#) of the Federal Service Labor-Management Relations Statute, to be excluded 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.

FPPS Titling Codes for OPM Official Titles

The Department recommends annotating applicable code(s) on the SPD HC-08.

1. **Wildland Firefighter**
 - a. SPD Number: DX00100 (GS-03); DX00200 (GS-04); DX00300 (GS-05); DX00400 (GS-06); DX00500 (GS-07)
 - b. FPPS Title Code: 01 Wildland Firefighter
 - c. FPPS Supervisory Status Code is 8.
2. **Lead Wildland Firefighter, GS-08**
 - a. SPD Number: DX00600
 - b. FPPS Title Code: 02 Lead Wildland Firefighter
 - c. FPPS Supervisory Status Code is 6.
3. **Supervisory Wildland Firefighter**
 - a. SPD Number: DX00700 (GS-08); DX00800 (GS-09); DX00900 (GS-10)
 - b. FPPS Title Code: 03 Supv Wildland Firefighter
 - c. FPPS Supervisory Status Code is 2.
4. **Supervisory Wildland Firefighter (Fire Management Officer)**
 - a. SPD Number: **(Assigned by the Bureau when choosing the correct PD template)**
 - b. FPPS Title Code: 04 Supv Wildland Firefighter (FMO)
 - c. FPPS Supervisory Status Code is 2.
5. **Wildland Firefighter (Fire Mgmt Plan)**
 - a. SPD Number: DX01000 (GS-07); DX01100 (GS-08), DX01200 (GS-09); DX01300 (GS-11)
 - b. FPPS Title Code: 05
 - c. FPPS Supervisory Status is 8.
6. **Wildland Firefighter (Prevention)**
 - a. SPD Number: DX01400 (GS-07); DX01500 (GS-08); DX01600 (GS-09); DX01700 (GS-11)
 - b. FPPS Title Code: 06
 - c. FPPS Supervisory Status is 8.

7. **Wildland Firefighter (Fuels)**
 - a. SPD Number: DX01800 (GS-07); DX01900 (GS-08); DX02000 (GS-09); DX02100 (GS-11)
 - b. FPPS Title Code: 07
 - c. FPPS Supervisory Status is 8.
8. **Wildland Firefighter (Prevention)**
 - a. SPD Number: DX02800 (GS-09); DX02900 (GS-11)
 - b. FPPS Title Code: 06
 - c. FPPS Supervisory Status is 4 (CSRA).
9. **Wildland Firefighter (Fuels)**
 - a. SPD Number: DX03200 (GS-09); DX03300 (GS-11)
 - b. FPPS Title Code: 07
 - c. FPPS Supervisory Status is 4 (CSRA).
10. **Wildland Firefighter (Fire Mgmt Plan)**
 - a. SPD Number: DX03400 (GS-12)
 - b. FPPS Title Code: 05
 - c. FPPS Supervisory Status is 8.
11. **Wildland Firefighter Apprentice**
 - a. SPD Number: DX 03900 (GS-03); DX 04000 (GS-04); DX04100 (GS-05)
 - b. FPPS Title Code: 09
 - c. FPPS Supervisory Status is 8.
12. **Wildland Firefighter (State/Regional)**
 - a. SPD Number: DX04200 (GS-12)
 - b. FPPS Title Code: 01
 - c. FPPS Supervisory Status is 8
13. **Wildland Firefighter (State/Regional)**
 - a. SPD Number: DX04300 (GS-12)
 - b. FPPS Title Code: 01
 - c. FPPS Supervisory Status is 4
14. **Wildland Firefighter (National)**
 - a. SPD Number: DX04400 (GS-12)
 - b. FPPS Title Code: 01
 - c. FPPS Supervisory Status is 8
15. **Wildland Firefighter (National)**
 - a. SPD Number: DX04500 (GS-13)
 - b. FPPS Title Code: 01
 - c. FPPS Supervisory Status is 8
16. **Wildland Firefighter (National)**
 - a. SPD Number: DX04600 (GS-13)
 - b. FPPS Title Code: 01
 - c. FPPS Supervisory Status is 4
17. **Wildland Firefighter (Fuels Mgmt)**
 - a. SPD Number: DX04700 (GS-12)
 - b. FPPS Title Code: 07
 - c. FPPS Supervisory Status is 8
18. **Wildland Firefighter (Fuels Mgmt)**
 - a. SPD Number: DX04800 (GS-12)
 - b. FPPS Title Code: 07
 - c. FPPS Supervisory Status is 4

19. **Wildland Firefighter (Prevention)**
- a. SPD Number: DX04900 (GS-12)
 - b. FPPS Title Code: 06
 - c. FPPS Supervisory Status is 8.

20. **Organizational Titles**

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

FPPS Special 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.** The following codes accurately reflect the type of special retirement coverage for a wildland firefighter position, primary or secondary. Codes for every employee in a special retirement position should be input to FPPS as determined by the Certification of Standard Position Approval for Retirement, on the coversheet of the position description.
 - a. 02 – Firefighter – primary/rigorous position
 - b. 02A – Firefighter – secondary administrative position
 - c. 02S – Firefighter – secondary supervisory
3. **Special Program Identifier (SPID).**
 - a. An “F” code must be used for all positions within the DOI’s wildland fire program’s table of organization.
 - b. Bureaus may determine the most appropriate “F” code to be used. Please see FPPS Special SPID Codes section below for additional guidance and information.
 - c. If a position is moved out of the wildland fire program’s table of organization, the “F” code must be removed. The “F” codes are only to be used for positions specifically within the DOI’s fire program’s table of organization.
4. **Public Safety Employee.**

All positions covered by special retirement must be marked “yes” for this data element. Otherwise, non-covered positions should default to “no”.

FPPS Special Program ID (SPID) Codes

All positions in DOI’s wildland fire organization must be coded by SHRO’s in FPPS to an “F” code, also known as a SPID code. HR practitioners should use the definitions below as a guide to best categorize each position into a special program area:

PREPAREDNESS

Positions that are primarily responsible for responding to wildland fire incidents (e.g., Fire Engine Operation, Hotshot, Helitack, Hand-crews, Smokejumper, Aviation, etc.):

- F1 – TEMPORARY PREPAREDNESS FIRE PLAN POSITION
- F2 – CAREER-SEASONAL PREPAREDNESS FIRE PLAN POSITION
- F3 – PERMANENT PREPAREDNESS FIRE PLAN POSITION

FUELS

Positions that are primarily responsible and related to prescribed fire, fuels treatment, planning and implementation (e.g., Fuels Management, Fire Management Specialist (Fuels), etc.):

- F4 – TEMPORARY FUELS FIRE PLAN POSITION
- F5 – CAREER-SEASONAL FUELS FIRE PLAN POSITION
- F6 – PERMANENT FUELS FIRE PLAN POSITION

SUPPORT

Positions that are administrative in nature where the primary work is to support the wildland fire organization (e.g., Dispatch, HR, Budget, Contracting, Training, etc.):

- F7 – TEMPORARY SUPPORT FIRE PLAN POSITION
- F8 – CAREER-SEASONAL SUPPORT FIRE PLAN POSITION
- F9 – PERMANENT SUPPORT FIRE PLAN POSITION

OTHER

Any other fire position that does not fit into the Preparedness, Fuels, or Support categories (e.g., Fire Management Planning, Fire Management Officer, Prevention, etc.):

- F0 – FIRE-OTHER