

**Position Management and Position Classification Policy Handbook**  
**Frequently Asked Questions & Answers**  
**Last updated: 4/20/2021**

Sec. #	Section Name	Questions & Answers
N/A	Definitions of Agency vs. Bureau	<p>Q. How does the Department define “Agency” vs. “Bureau”?</p> <p><b>ANSWER: The law describes "Agency" as the Department of the Interior, and the "Bureau" is an organizational unit below the "Agency" level - (BOR, USGS, NPS, etc.).Therefore, the terms "Agency" and "Bureau" in position classification cannot be used interchangeably. [5 USC 101, 102, 105, and 5102]</b></p>
1.3	General Position Management Guidelines	<p>Q. Who is responsible for establishing an authorization and control procedure?</p> <p><b>ANSWER: All position management processes should be performed in partnership between managers/supervisors of record and their HR servicing personnel office. Human Resources (HR) is a strategic partner to management.</b></p>
1.5	Organizational Charts	<p>Q. Who is accountable for ensuring org charts are maintained and approved by a higher-level authority? What must org charts contain?</p> <p><b>ANSWER: Bureau management may delegate this responsibility to anyone within their chain of command. All position management processes should be performed as a partnership between managers/supervisors of record and their HR servicing personnel office.</b></p> <p>Q. Is there a standard of adequacy that pertains to what organizational charts need to contain?</p> <p><b>ANSWER: At a minimum, staffing charts/organizational charts shall contain each position’s official title, series and grade.</b></p> <p>Q. There are offices that seem to be in perpetual change – some as often as every time a new position is created. Is there a “rule of thumb” time frame or frequency as to when updated/new organization charts can be submitted?</p> <p><b>ANSWER: Organization charts are used to describe the overall structure of an organization and do not need to be updated every time there is a change to an individual position. Bureaus will determine how often organization charts need to be updated and should include this determination in their policies.</b></p>

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1.6	Supervisor to Employee Ratio	<p>Q. Do the supervisory ratios apply to lead positions as well?</p> <p><b>ANSWER: The supervisor to employee ratio applies to GSSG supervisory positions (Code 2). It does not apply to lead positions and it does not apply to Code 4 non-GSSG supervisors.</b></p> <p>Q. When is it appropriate to establish a Code 4 supervisory position?</p> <p><b>ANSWER: It is appropriate to establish a Code 4 supervisory position only after position management principles have been evaluated and a code 4 is determined to be appropriate and supportable.</b></p> <p><b>The creation of a Code 4 supervisor might erode the grade/classification of a code 2 GSSG supervisory position. At a minimum, structure and complexity of the organization must be evaluated.</b></p> <p><b>Code 4 supervisory positions are not used:</b></p> <ul style="list-style-type: none"> <li>• to provide an employee with supervisory experience</li> <li>• to manage a project/serve as a project lead</li> <li>• to train or mentor junior employees</li> <li>• to share or relieve a code 2 supervisor of all or some of their supervisory responsibilities</li> <li>• for nonpermanent positions, or</li> <li>• any situation where more appropriate position management can be applied</li> </ul> <p><b>While position management issues related to Code 4 supervisory positions are not directly addressed in the Introduction to Position Classification Standards or the Classifier's Handbook, many OPM appeal decisions and several OPM Digest of Significant Classification Decisions and Opinions articles address the appropriate application of position management principles in managing small workloads.</b></p> <p>Q. Is there an exception for the size of a bureau? Some of the field offices don't even have 4 total employees.</p> <p><b>ANSWER: Bureaus may establish <i>exception</i> rules/procedures for HR servicing offices to follow for situations wherein the organization's size cannot support the 1:4 ratio.</b></p> <p>Q. How do we go about getting an exception?</p>

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		<b>ANSWER: Bureaus may establish their own process/procedure.</b>
1.8	Full Performance Level and Career Ladders	<p>Q. Referring to section 2.6, it states that a statement of difference will not meet the standard of adequacy. Does this mean that we can no longer use statements of difference(s)/grade banding statements?</p> <p><b>ANSWER: A statement of difference is not an <i>official record</i> of the position - a position description is the official record. The PD and OF-8/cover page are used to make pay determinations and commit government funds and must therefore be the complete, official record of the position.</b></p> <p>Q. Does this mean that we need to have a fully described and evaluated PD for each grade level within the career ladder (FPL is GS-11, you recruit at the GS-05, so you need a full PD at GS-05, GS-07 and GS-09)?</p> <p><b>ANSWER: Yes, there must be fully defined position descriptions with clear differentiations between grade levels.</b></p> <p>Q. Are Pathways positions considered permanent in the context of this section and career ladders?</p> <p><b>ANSWER: See 5 CFR 362.105(a) Workforce planning.</b></p>
1.10	Vacant Positions	<p>Q. All vacant positions will be recorded/tracked. Is there a particular way in which Interior intended for this to happen?</p> <p><b>ANSWER: At this time, the Department does not mandate the use of a particular format or system to track vacant, funded positions. Bureaus may establish their own procedures.</b></p>
1.11	Vice or Identical/Additional Action	<p>Q. What is intended by Interior for recertification documentation? For example, a completely new OF-8? OR Management initials at the bottom of the current OF-8 that the duties are still accurate and necessary? This question applies to section 2.9, as well.</p> <p><b>ANSWER: Bureaus can decide if they want to create new PD cover sheets, or simply initial and date the original PD cover sheet.</b></p>
2.1	Delegated Classification Authority	<p>Q. Do employees in temporary "acting" assignments have the delegation of classification authority for the position for which they are acting (e.g., an employee who does not have delegation of classification authority but is temporarily acting for the HR Director who has delegation of classification authority)?</p>

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		<p><b>ANSWER: Bureaus should establish internal controls on delegations of classification authority to employees in temporary acting assignments.</b></p>
2.5	Request for Exception - DOI Standard PDs	<p>Q. Can a DOI Standard Position Description be amended to add supervisory duties that are 20% or less (code 4)?</p> <p><b>ANSWER: It is not appropriate to add supervisory duties to a DOI SPD because this would require broad changes to the supervisory coding and position build. Positions performing supervisory duties must have this described in a new PD and submitted to HR/classification for an evaluation.</b></p> <p>Q. Should the waiver request have a specific format?</p> <p><b>ANSWER: The waiver request can be in memorandum or letter format.</b></p> <p>Q. Should bureaus be developing a mechanism similar to the Department Personnel Bulletins to require use of Standard PDs?</p> <p><b>ANSWER: Department Personnel Bulletins mandate the use of Standard PDs and Standard PD numbers; however, Bureaus may create their own Bureau-level mechanism for establishing and mandating use of bureau Standard PDs.</b></p>
2.6	Standards of Adequacy	<p>Q. What is the expectation of what a statement of difference will look like, and can they be used?</p> <p><b>ANSWER: A statement of difference is not an <i>official record</i> of the position - a position description is the official record. The PD and OF-8/cover page are used to make pay determinations and commit government funds and must therefore be the complete, official record of the position.</b></p> <p>Q. Narrative evaluation statements are required for full performance level positions - what does this mean?</p> <p><b>ANSWER: At a minimum, narrative evaluation statements (not summary evaluations) are required for the full performance level/grade of a career ladder position; it is not necessary to write a narrative evaluation for each grade level unless required by the Bureau. A complete narrative evaluation statement includes an explanation of how the position exceeds the next lower grade or factor level, how it meets the credited grade level or factor level, and how it does not meet the next higher grade or factor level.</b></p>

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2.10	Other Significant Facts	<p>Q. Does the Department want this specific title or can another title be used?</p> <p><b>ANSWER: “Other Significant Facts” or similar wording can be used.</b></p>
2.11	Titling Practices	<p>Q. Are Bureaus required to develop a library of approved titles?</p> <p><b>ANSWER: Official titles are prescribed by OPM. Bureaus have the flexibility to construct titles when no OPM prescribed titles exist, and Bureaus are responsible for ensuring position titles are consistently constructed and applied and built in automated systems.</b></p>
2.12	Grade Stacking	<p>Q. What is grade stacking?</p> <p><b>ANSWER: Grade stacking occurs when a subordinate position is established at the same grade as the supervisor.</b></p> <p>Q. What must be included in the “complete narrative evaluation statement” as referenced in the Policy?</p> <p><b>ANSWER: In addition to the information contained in a comprehensive evaluation statement as described in Section 2.22, for grade stacking situations the narrative evaluation statement should also include analysis and evaluation of position management implications associated with grade stacking. For example, an explanation of the nature and background of the proposed action, impact on other positions, analysis of organizational alternatives, and evaluation of positions within the organization.</b></p> <p>Q. Who is “prepared, approved and authorized by management” as referenced in the Policy?</p> <p><b>ANSWER: Management includes both HR management and line management. The servicing HR office will work with line management to complete the narrative evaluation statement. The evaluation statement will be approved and authorized by the Bureau HR Director or their delegate. The delegate must have delegated classification authority and may include the servicing HR Officer. This delegation cannot be further delegated.</b></p>
2.13	Developmental or Trainee “Lead, Supervisory and	<p>Q. The policy states that positions with supervisory duties less than 25% are non-supervisory. What does this mean?</p> <p><b>ANSWER: Positions with supervisory duties less than 25% are “non-GSSG supervisory” positions which means that they are not classified using the General Schedule Supervisory</b></p>

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	Management” Positions	<p><b>Guide and are not titled Supervisory. If the delegated supervisory authorities meet the definition of supervisor found in the 5 USC 7103(CSRA supervisors) then these positions are Code 4 supervisors.</b></p> <p>Q. For positions that supervise less than 25% of the time (Code 4), can programs that don't have acadre of applicants, for example, between the GS-14 Code 4 Supervisor and the GS-12 staff create aCode 4 supervisory GS-13/14?</p> <p><b>ANSWER: Bureaus/offices have the flexibility to establish career ladders for Code 4 supervisory positions using sound position management and classification principles. These positions are not graded on the application of the GSSG.</b></p>
2.17	Accretion of Higher-Graded Duties	<p>Q. Accretion of duties must be approved by the applicable HR Director. Is this Bureau level HROfficer or servicing level HR Officer?</p> <p><b>ANSWER: This is the bureau level HR Director or his/her delegate, which mayinclude the HR Officer of the servicing HR office.</b></p>
2.22	Comprehensive Evaluation Statements	<p>Q. The terms complete narrative evaluation statement and comprehensive evaluation statement,are they interchangeable?</p> <p><b>ANSWER: Yes, they are interchangeable.</b></p> <p>Q. Bureaus/Offices will submit comprehensive, narrative evaluation statements to the Department for positions undergoing a Departmental classification appeal. What are other scenarios wherein acomprehensive evaluation statement would be appropriate?</p> <p><b>ANSWER: Other scenarios wherein a comprehensive evaluation statement would be appropriate is when a brand-new position is being created, or Factor 5 is at or above 5-4. It is important that Bureaus not apply the terms Agency and Bureau interchangeably. The Bureau is an organizational unit below the Agency.</b></p> <p>Q. Do Bureaus have to write narrative evaluation statements for PD re-writes/redescriptions?</p> <p><b>ANSWER: It might not be necessary to write a narrative evaluation statement for PD re-writes/redescriptions if a full evaluation has already been done and it is still accurate (series, title, grade determinations still apply). The evaluation statement should be kept with the updated</b></p>

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		<p><b>PD.</b></p>
3.2	Department Appeals	<p>Q. Can GS employees appeal to the bureau, then to the Department, and then OPM? In the past this was either the bureau or Department, but not both.</p> <p><b>ANSWER: GS employees have the option of appealing directly to the Bureau and/or the Department, and/or OPM.</b></p> <p>Q. Bureau headquarters employees cannot appeal to the bureau? Is this interpretation correct?</p> <p><b>ANSWER: Employees have the right to appeal to a higher level than where they are organizationally assigned. However, Bureau headquarters (HQ) employees can appeal to their HQ office if they choose, or they may file directly to the Department, or OPM.</b></p> <p>Q. How are headquarters employees defined?</p> <p><b>ANSWER: Headquarters employees are employees who are <i>organizationally</i> assigned to a headquarters position.</b></p> <p>Q. Can RGE scientists appeal directly to OPM?</p> <p><b>ANSWER: If RGE scientists want to appeal directly to OPM, they can request an exception from the Bureau's HR Director.</b></p> <p>Q. How does DOI handle appeals to Identical Additional (I/A) positions? In these situations, do the employees only have appeal rights to the bureau and to OPM?</p> <p><b>ANSWER: The Department will consider I/A appeals on a case-by-case basis if all employees assigned to an I/A position file an appeal together.</b></p> <p>Q. If a single employee on an I/A position or a Standard PD files an appeal - should we just turn down these requests or advise the employee of their right to file an OPM Appeal?</p> <p><b>ANSWER: The supervisor and HR should try to reassign the employee to an individual PD if appropriate. Employees should be advised of their right to appeal to OPM.</b></p> <p>Q. Since the Federal Wage System (FWS) requires employees to have a decision from their employing agency</p>

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		<p>before filing an appeal with OPM, what, if any, recourse would these employees have if Bureaus deny them at the Bureau level?</p> <p><b>Answer: OPM requires FWS employees to have a decision from their employing agency prior to filing an appeal with OPM. Appeals filed by FWS employees will be accepted and adjudicated. If FWS employees are dissatisfied with that decision, they can then file an appeal with the Department or OPM.</b></p>
5.2	Record Keeping	<p>Q. The PD and all related documents in the eOPF. What is meant by all related documents?</p> <p><b>ANSWER: The Bureaus may determine what related documents should be in the eOPF, consistent with OPM’s Guide to Data Standards, Guide to Personnel Recordkeeping, and the Guide to Processing Personnel Actions. An evaluation statement for the full performance level is an example of a related document.</b></p>
	Other duties as assigned	<p>Q. Is a generic statement, “Other duties as Assigned” appropriate to add to a PD?</p> <p><b>ANSWER: It is recommended that HR include a statement such as “Other Similar Duties as Assigned” to ensure that ad hoc duties are job related.</b></p>
App. A	Conflict Resolution Process	<p>Q. Will there be a charge to the bureaus for issues that are raised to the Interior level?</p> <p><b>ANSWER: Currently there is no charge. The process is intended to help resolve disagreements with classification determinations between bureau servicing human resources staffs and supervisors/managers of positions. This process is not available</b></p>