

**Department of Defense (DoD)**  
**Civilian Personnel Management Service (CPMS)**  
**Field Advisory Services - *FAS***  
**Classification Appeal Decision**

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<b>DoD Decision:</b>	<b>Housing Referral Officer, GS-301-09</b>
<b>Initial classification:</b>	Housing Referral Officer, GS-301-09
<b>Organization:</b>	Army Base Public Works Directorate Family Housing Division
<b>Date:</b>	January 5, 1998

**BACKGROUND**

On August 28, 1997, Defense Civilian Personnel Management Service, Field Advisory Services Division accepted a classification appeal from , who is currently classified as a Housing Referral Officer, GS-301-09. The appellant appealed the occupational series allocation of his position, requesting that his position be reclassified to Housing Referral Officer, GS-1173-09.

**SOURCES OF INFORMATION**

- Information contained in appeal file submitted by servicing Civilian Personnel Office
- Telephone audit with appellant
- Telephone interview with appellant's first line supervisor

**POSITION INFORMATION**

The appellant serves as the Housing Referral Officer, and is located in the Family Housing Division, Community Homefinding, Relocation, and Referral Section (CHRRS). CHRRS is responsible for providing assistance to military members, their families, and eligible civilians in locating off-post housing. As head of CHRRS, the appellant leads four other workers in performing the duties of the office, to include compiling and maintaining up-to-date listings of available housing for rent or sale; conducting inspections of dwellings for adequacy, and to ensure adherence to regulatory and DoD policies regarding discriminatory practices (appellant resolves questionable or controversial inspections); develops means for broadening pool of listings; maintains liaison with local realtors, apartment complex managers, and housing agencies for the purpose of publicizing the installation's housing needs and expanding the listings; assisting and counseling soldiers who are interested in purchasing a home (provides information on mortgages, VA loans, price ranges, need for an attorney, interest rates, etc.); dealing directly with landlords and military tenants to resolve disputes; and investigating complaints of discrimination. Also, the appellant provides input for the Department of Army's Econometric Model, which is used in justifying additional housing assets for the installation. This involves reviewing and analyzing local housing capabilities to determine if it is able to meet The installation's future housing requirements.

As the section leader, the appellant directs the operations of the CHRRS by distributing and balancing workload among the employees; instructing employees on work processes and techniques; training new employees; passing on and explaining the supervisor's instructions; checking on work in progress and reviewing completed work; notifying supervisor of any disciplinary or performance related problems, with a recommended solution; providing input to the supervisor for performance appraisals; and recommending personnel actions (recruitments, promotions, terminations, etc.) to the supervisor. It should be noted that this position was previously classified as a supervisor, but was restructured by management over a year ago. The supervisory responsibilities were removed, and replaced by leader duties.

In addition to the housing referral duties, the appellant is responsible for developing the Family Housing portion of the daily in-processing brief to new arrivals. The appellant researches, compiles and prepares information to be presented in the brief (generally by CHRRS staff), and occasionally presents the brief himself. The briefing contains information about the entire family housing operation, including assignments and terminations, off-post housing, transition from rental housing to government quarters, facility management, billeting, and general housing policy. During the brief, the presenter (appellant) is expected to field questions from soldiers on all aspects of the Family Housing program, as well as other areas of interest, such as community services, waiting lists, waiting time, etc.. In addition, the CHRRS also provides assistance and information to military members relocating to other installations. Specifically, the appellant (or subordinate staff) provides information on housing

procedures at other installations, as well as general information regarding relocation.

As a section head in the Family Housing Division, the appellant is often called upon to review new or proposed regulation, guidance, or policy issued by higher authority, for the purpose of interpretation and to determine any impact on the operations of the CHRRS, or the division as a whole. In general, these reviews are limited in scope to issues pertaining to housing referral and relocation matters, but may occasionally touch on matters outside the purview of the CHRRS, such as facilities management or assignments and terminations. In addition, the appellant is required to perform special projects that are not limited to CHRRS functions. For example, the appellant was recently assigned as the Family Housing Division representative on the Malcom Baldrige Writing Team, in which he had to exercise a thorough knowledge of the base housing operations and functions. Another example cited by the appellant (and the supervisor), was a recent emergency situation, in which the appellant was called upon to respond to a fire at one of the housing units (located off-site), and coordinate the division's actions at the scene. The appellant was called because of his proximity to the housing units, as well as the supervisor's confidence in his ability to deal with the situation. According to the appellant's supervisor, the appellant is knowledgeable in all of the division functions, and may be assigned projects that cross functional lines.

#### **STANDARD(S) REFERENCED**

- OPM Position Classification Standard for Housing Management Series, GS-1173
- OPM Position Classification Standard for Miscellaneous Administration and Program Series, GS-301
- OPM Work Leader Grade Evaluation Guide

#### **SERIES AND TITLE DETERMINATION**

The appellant has specifically appealed the series allocation of his job (GS-301), arguing that his position belongs in the GS-1173 series. According to the principles of position classification, the occupational series of a position is determined by the duties and responsibilities that are the primary purpose for which the position was established. Generally, those duties also comprise at least the majority of the major duties, and are the grade controlling duties of the position.

The GS-1173 Housing Management series covers "positions the duties of which are (1) to manage or to assist in managing one or more family housing projects, billeting facilities, or

other accommodations such as transient or permanent individual and family living quarters, dormitory facilities and restricted occupancy buildings including adjacent service facilities and surrounding grounds; and/or (2) to administer, supervise, or perform work involved in the evaluation of housing management programs, the development of administrative procedures, and the provision of technical assistance to onsite housing management." Specifically excluded from the GS-1173 series are "positions the duties of which are to administer, supervise, or perform work which involves (a) locating and maintaining listings of adequate, suitable, and economical nondiscriminatory housing for rental or sale; (b) providing information and assistance to military and civilian employees of Federal agencies and departments in locating such housing; and (c) promoting equal opportunity in housing policy in communities adjacent to Federal installations. Such positions are classified in the General Administrative, Clerical, Office Services Group, GS-300."

The appellant performs work which is characteristic of both the coverage statement and the exclusionary statement in the GS-1173 standard. The primary work function performed by the CHRRS (and directed by the appellant) is specifically excluded by the standard. The housing referral function, while part of the overall military housing management program, does not fit into one of the categories of work covered by the GS-1173 standard, i.e., (1) direct management of housing assets or (2) evaluation of housing projects or programs. Rather, the standard views these referral services as a single administrative function (analogous to the accounting function, or facility management) that falls under the broader housing management program, requiring a separate and distinct body of knowledge and skills. Without specific responsibility for managing government owned housing assets, the appellant's housing referral duties cannot be classified into the GS-1173 series.

The appellant performs some work assignments, however, that meet the definition for coverage under the GS-1173 series. These include the review, analysis, and interpretation of policy and regulations issued by higher authority that impacts the operations of the entire housing operations; the preparation and presentation of the briefing to new arrivals on the installation's housing program; and the occasional performance of special projects that deal with the installation's overall housing program (assignments and termination, housing policy, facilities management, etc.). These duties require knowledge of the installation (and Department of Army's) housing policies, operations, and procedures, and the ability to apply that knowledge to a variety of situations (representing the Family Housing Division to outside organizations; responding to emergency situations). According to the appellant's supervisor, shrinking resources and downsizing have forced him to assign projects to his section heads that cross functional lines. These assignments, however, often are a function of the appellant's personal qualifications (knowledge of the overall housing operation) rather than his position as the Housing Referral Officer.

In reviewing all of the duties performed by the appellant, it is apparent that the position constitutes a mixture of duties, some of which are covered by the GS-1173 series, and some specifically excluded. It is clear, however, that the duties which constitute the reason for the existence of the position (or primary duties), are those related to the housing referral services (excluded from the GS-1173 series). Also, these duties occupy the majority of the position's duty time (approximately 85%) and are grade controlling. The GS-1173 duties comprise less than 25% of the duty time, and thus are not grade controlling. Hence, the position cannot be classified into the GS-1173 occupational series.

The exclusionary statement in the GS-1173 standard states that positions involved in housing referral work are to be classified in the General Administrative, Clerical, Office Services Group, GS-300, but does not suggest a specific occupational series. The appellant has responsibility for administering The installation's housing referral program, which requires knowledge of federal, DoD, state and local housing laws and statutes, to include those regarding housing discrimination and equal opportunity. In addition, the appellant must be knowledgeable in administrative and management practices and techniques in order to effectively oversee the CHRRS, which provides a variety of services to a large customer population. While the work of the appellant's position falls under the GS-300 occupational family, no specific series is directly applicable. The most appropriate series for the appellant's position, therefore, is the GS-301 Miscellaneous Administrative and Program Series, which "includes positions the duties of which are to perform, supervise, or manage nonprofessional, two-grade interval work for which no other series is appropriate. The work requires analytical ability, judgment, discretion, and knowledge of a substantial body of administrative or program principles, concepts, policies, and objectives."

There are no prescribed titles in the GS-301 standard. The position's current title, Housing Referral Officer, was constructed by the local personnel office, and is sufficient.

### **Discussion of Leader Duties**

The appellant, as a regular and recurring part of his job, leads four Housing Referral Assistants in the performance of the work of the section. These responsibilities include distributing and balancing work assignments among the employees, instructing them on work processes and techniques, checking on work in progress and reviewing completed work for adequacy, training new employees, reporting to the supervisor on a variety of matters; and making recommendations to the supervisor in regards to personnel actions, discipline, and performance. The Work Leader Grade Evaluation Guide is used to classify positions that "lead three or more employees in accomplishing work in clerical or other one-grade interval occupations in the General Schedule." The appellant's position meets the coverage under this

guide. However, as the subsequent grade evaluation will show, the nonsupervisory, two-grade interval work performed by the appellant represents the highest graded work, disallowing the use of "Lead" in the position's title. The Work Leader Grade Evaluation Guide states that "where the final grade of such a position is based on its nonsupervisory work, the position is titled, and classified as a nonsupervisory position, and not as a leader."

## **GRADE DETERMINATION**

### **Leader Duties**

The appellant leads four Housing Referral Assistants, two GS-7's and two GS-5's, who perform one-grade interval, technical support work. According to the Work Leader Grade Evaluation Guide, the leader job is classified one grade higher than the highest level of nonsupervisory work led. Therefore, the appellant's leader duties are classified at the GS-8 level.

### **Nonsupervisory GS-301 Duties**

The GS-301 standard contains no grading criteria, but directs that positions classified to that series are to be evaluated using an appropriate multiseries guide or a series standard that involves analogous knowledges and skills. The local personnel office has classified the position into the GS-301 series, and chose to use the GS-1173 standard for grading purposes. The GS-1173 standard is an appropriate selection for evaluating this position. This is not to say that the criteria is directly applicable to the appellant's primary duties, but rather that it covers two-grade interval, non-professional work that is related to the work of the appellant's position, allowing for analogous descriptions of work situations.

The grade of the position will be evaluated against the nine FES factors found in the GS-1173 standard.

### **Factor 1. Knowledge Required**

The position requires a thorough knowledge of federal, state, local, DoD, Army, and base housing policies, procedures, laws and regulations, as well as knowledge of administrative/management practices, principles and techniques required to oversee the housing referral functions at the installation, including developing listings of non-discriminatory housing for rental or purchase; inspecting prospective housing for adequacy, and counseling military members and their families on a variety of off-post housing issues (home purchase,

leases, landlord/tenant relations). The work also requires skill in analyzing and evaluating policies and regulations to determine impact on program operations and make substantive recommendations to supervisor regarding local procedures. This degree of knowledge is comparable to level 1-6 under Factor 1. (Concur with local personnel office.)

## **Factor 2. Supervisory Controls**

The appellant works under the general supervision of the division chief, who assigns work in terms of overall goals and objectives, and expects the appellant to plan and carry out assignments independently, resolving problems in accordance with established procedures and policies. The appellant's work is reviewed for feasibility, compatibility with program requirements, and effectiveness in meeting established objectives. This is comparable to level 2-3, as described in the standard. (Concur with local personnel office.)

## **Factor 3. Guidelines**

Guidelines are comprised of a variety of federal, state, and local laws and regulations, as well as DoD and Army policies and procedures, some of which are not detailed or specific. The appellant is required to exercise judgment in researching, interpreting and applying guidance to specific situations (related to the housing referral section), and make recommendations in adapting guidance and setting local procedures. This is characteristic of level 3-3. (Concur with local personnel office.)

## **Factor 4. Complexity**

The work of the position involves a variety of assignments (routine and non-routine) dealing with providing referral services to a large customer base. As the housing referral officer, the appellant must be able to identify trends or problem areas (changes in laws or regulations, complaints of discrimination, ongoing tenant/landlord problems), and devise new procedures that respond to the needs of those utilizing the CHRRS. Such assignments are comparable to level 4-3, as described in the standard. (Concur with local personnel office.)

## **Factor 5. Scope and Effect**

The purpose of the work is to provide off-post housing referral services (non-discriminatory, affordable, adequate housing for rent or purchase) to the military (and some civilian) population of the installation, as well as to assist those living off-post with a variety of problems related to their housing situation. The work impacts the Family Housing Division's ability to provide essential housing services to the military population at The installation, as

well as the quality of life of numerous military members and their families. This is characteristic of level 5-3. (Concur with local personnel office.)

### **Factor 6. Personal Contacts**

Contacts are with a variety of military members (various ranks) and their families, housing personnel, local housing officials, community service agencies, realtors, landlords, and property managers, and generally occur in a variety of settings, structured and unstructured. Level 6-3 is credited. (Concur with local personnel office.)

### **Factor 7. Purpose of Contacts**

Contacts are for the purpose of providing and exchanging information related to off-post housing, resolving tenant/landlord problems, investigating complaints of discrimination, and coordinating actions of the section with other division personnel. These types of contacts are comparable to level 7-2 in the standard, where the purpose of contacts are to "plan and/or coordinate management functions with other agency housing personnel; serve as principal point of contact and discuss matters related to occupancy, maintenance, technical requirements, or other areas of interest with local project representatives; resolve or eliminate problems; reach general agreement on techniques, and clarify established goals, objectives and responsibilities." At level 7-3 (credited by the local personnel office), the purpose is to "influence or persuade agency or local housing specialists, tenants, and local special interest committees or groups to accept plans, schedules, technical or policy requirements, and methods that have elements of conflict; to negotiate or mediate agreement among conflicting parties; to cooperate with and coordinate law enforcement efforts; or to justify the feasibility or validity of proposals concerning housing facilities or resources to agency officials or committees that are composed of housing specialists and others authorized to grant approvals." While the position description uses similar phrases and terms, the purpose of the appellant's regular and recurring contacts does not meet the intent of level 7-3. The appellant may be regularly involved in disputes between tenants and landlords, but not to the extent or scope envisioned by 7-3. Level 7-2 is credited.

### **Factor 8. Physical Demands**

There are no special physical requirements. Level 8-1 is credited. (Concur with local personnel office.)

### **Factor 9. Work Environment**

Work is generally performed in an office setting. Level 9-1 is credited. (Concur with local personnel office.)

SUMMARY OF FES FACTORS

<b>Factor</b>	<b>Level Assigned</b>	<b>Points</b>
1	1-6	950
2	2-3	275
3	3-3	275
4	4-3	150
5	5-3	150
6	6-3	60
7	7-2	50
8	8-1	5
9	9-1	5
	<b>Total</b>	<b>1920</b>

Point Range:: GS-9 1855-2100

**DECISION**

The appellant's position is properly classified as Housing Referral Officer, GS-301-09.