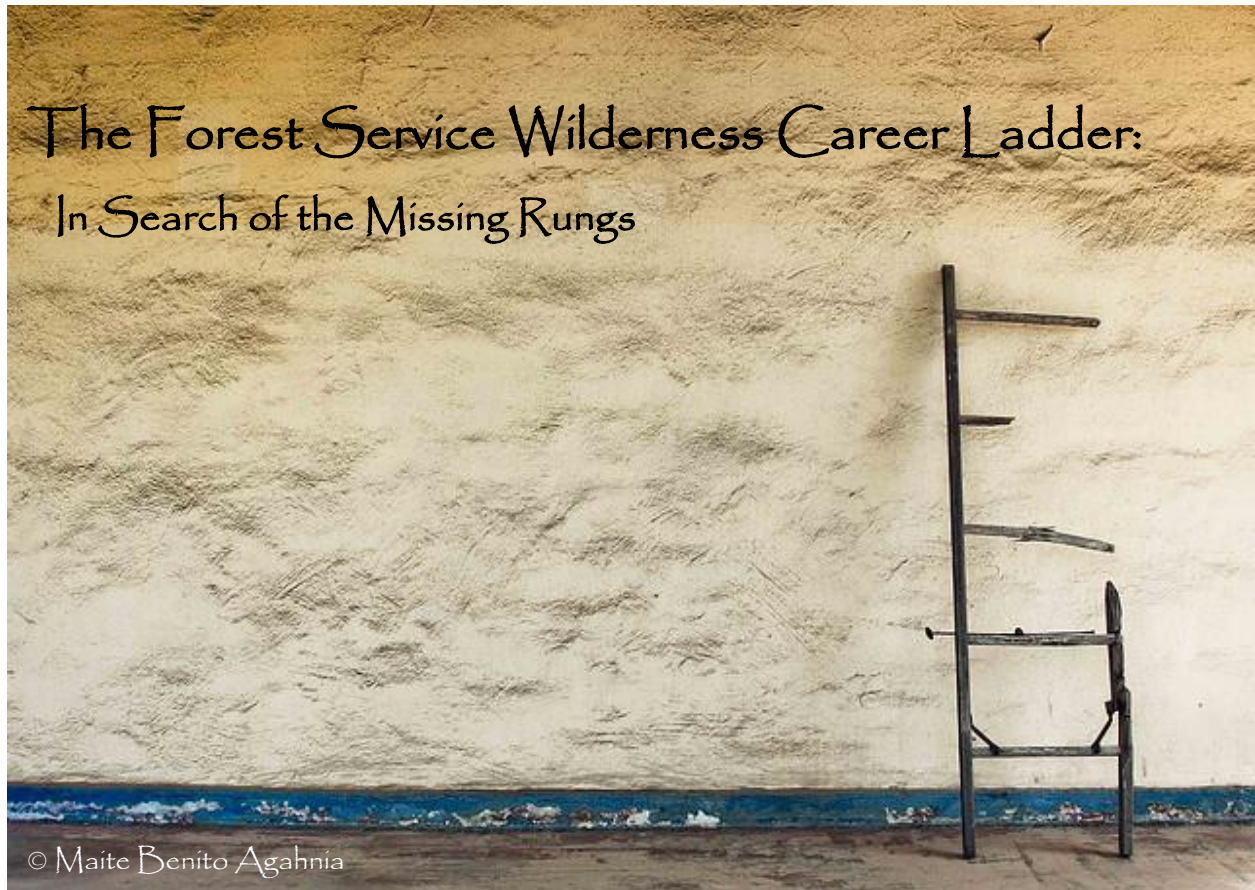


The Forest Service Wilderness Career Ladder: In Search of the Missing Rungs



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Executive Summary

As we approach the Wilderness Act's golden anniversary, there is widespread concern within the wilderness management community regarding difficulties Forest Service wilderness employees face career-wise. For aspiring wilderness stewards engaged in career planning, not only is there no roadmap to guide them from the field to leadership in wilderness management - for many there appears to be no road allowing for ascension. Current administrative and bureaucratic barriers compromise agency hiring and employee retention and have much farther reaching effects. In order to best manage wilderness the Forest Service must attract and retain the best and brightest wilderness stewards. The current hiring process fails this strategy. Many high caliber wilderness stewards are excluded from consideration.

In 2012 a sub-team from the Chief's Wilderness Advisory Group (WAG) responded to suggestions from the field and investigated the lack of a well-defined career path in wilderness. These suggestions came from a variety of Regions and from employees at a variety of pay grades. The sub-team found that there are a great number of employees who feel trapped in entry-level 0462 Forestry Technician positions. These employees have had extreme difficulty breaking into the professional 0401 General Natural Resources Management series positions that represent the next logical step in their career. There is widespread frustration that relevant work experience in a 0462 position does not count towards qualifying someone for their supervisor's job. Other significant problems include human resources personnel inconsistently interpreting work experience, consistently disregarding functionally relevant coursework and ignoring pertinent employment practices that would help qualify employees. While conducting their research the sub-team found that half of the WAG's regional representatives had been directly affected by the issue.

There are two dilemmas at the heart of this matter: (1) a lack of clear direction as to what experience or coursework is applicable for qualification in wilderness-focused 0401 series positions; and (2) a non-existent bridge between technician positions and higher-graded professional series positions. Disenfranchisement by the qualification process and limited options for advancement directly impact employee morale and retention. In some cases employees already working in permanent 0401 positions have been red-flagged as not possessing the education or work experience to perform their current position despite strong performance ratings. This negatively affects those flagged as well as their peers working in the same series who fear that they may be the next to be audited retroactively.

This report includes a review of the broken career ladder's history, a summary of the impacts on wilderness management, and a series of detailed recommendations for addressing the concern. It also includes case studies of actual wilderness ranger and manager experiences that illustrate the barriers employees face. The intention of the report is to raise awareness of the issue at all levels of the agency and to stimulate national leadership to act on the recommended actions as critical priorities.

Introduction

Position classification standards are intended to be a guide to judgment, not a substitute for it. Standards are prepared on the assumption that the people using them are either skilled personnel management specialists or managers who are highly knowledgeable about the occupations which are basic to their organizational units.

In the development of occupational standards, OPM has no intention of establishing a rigid framework for putting jobs in categories. The standards program has been oriented toward a broad concept of job structure that aims to: (1) broaden the range of backgrounds for initial entry into occupations; (2) remove artificial barriers between related occupations; (3) increase responsiveness to needs of management and of career patterns...¹

From the Office of Personnel Management's "Introduction to the Position Classification Standards" TS-134 July 1995, TS-107 August 1991 Revised: August 2009

The current era is an exciting time for those in the wilderness management profession. We are closing in on the 50th anniversary of the Wilderness Act of 1964 and the National Wilderness Preservation System has grown from 9.1 million to 109.5 million acres. A group of passionate wilderness stewards has also come together to create the Society for Wilderness Stewardship (SWS), an organization for wilderness professionals that seeks to advance the profession of wilderness stewardship, science, and education to ensure the life-sustaining benefits of wilderness.

Despite these bright points serious issues within the staffing arena threaten the overall success of the Forest Service's wilderness management program. These issues surround the lack of a well-defined career path to guide bright and promising wilderness stewards. These administrative and bureaucratic barriers directly affect agency hiring and employee development. Their indirect effects reach much farther. These impacts have received little attention from agency leadership and have unacceptable implications for the future of wilderness management.

¹ U.S. Office of Personnel Management, Introduction to the Position Classification Standards, TS-134 July 1995, TS-107 August 1991 Revised: August 2009, p.8.

Current Staffing Wilderness Management Strategy

Nearly all entry level USFS jobs in the wilderness management field are classified in the 0462 (Forestry Technician) series. In the past, a seasonal wilderness ranger might be hired as a GS-0462-05 and be supervised by a crew leader in the same job series at the GS-6 to 8 level. Depending on the area and position complexities, field-based wilderness manager positions were often advertised as supervisory forestry technicians at the GS-9 to 11 level.

At present the Forest Service rarely uses the 0462 (Forestry Technician) series for positions in wilderness management that are at the GS-09 level or higher. Positions such as wilderness manager that are advertised at or above the GS-09 level are usually classified under the 0401 (General Natural Resources Management and Biological Sciences) series. This series represents professional rather than technical work. Significant issues have arisen as a result of this staffing strategy and are discussed in detail below.

Experience-Based Qualification

The first issue is that the seasonal wilderness ranger is no longer able to climb a career ladder in the wilderness management profession based on their experience and performance. This is in stark contrast to the traditional model of “climbing the corporate ladder” that the Forest Service was built on, and which continues to be the norm outside of the federal government.

The Office of Personnel Management (OPM) sets the standards and occupational requirements associated with each federal job series. To meet basic qualifications for a position in the 0401 series applicants must possess either

- A. Degree: biological sciences, agriculture, natural resource management, chemistry, or related disciplines appropriate to the position.

OR

Case Study: Qualifying Experience

An employee with six years of experience as a GS-0462-08 attempts to obtain a 120-day detail in his supervisor's position which is normally classified as a GS-0401-09/11. The employee attempts to qualify for the position based on a combination of education and experience. It is determined that he has the requisite amount of education to be used in combination with experience but human resources will not assess the relevance of his experience because it is assumed to be technical in nature due to the series under which he works. The employee qualifies for and accepts the detail when it is advertised as a GS-0462-09 though the duties are identical to those of the GS-0401-09/11. He receives a Fully Successful performance rating but the practical experience does not make him any more qualified when the position is later advertised as a GS-0401-09/11. When asked for clarification, the HR specialist replies "no amount of experience at any GS level working under a technician series will make you qualified for a professional series position." Though demonstrably qualified and capable, the employee has no chance to ascend.

B. Combination of education and experience -- Courses equivalent to a major, as shown in A above, plus appropriate experience or additional education.

If an applicant has 24 credit hours (equivalent to a major) of coursework in a discipline appropriate to the position (discussed in the next section) then they may pair this with experience to qualify according to option B. Those employees who have gained valuable real world experience with wilderness management through employment in the 0462 series and are trying to qualify for a 0401 position in this manner are routinely being told that technician experience of any type or degree does not count as professional experience. This holds true regardless of what duties have actually been performed as the HR staffing specialists generally do not look past the job series in which the experience was gained. By default this logic allows qualification through experience only by those with time in the 0401 series or experience outside the federal government. In effect, USFS employees are penalized for obtaining their experience with the agency. In contrast, in the private sector the staffing specialists look at the actual accomplishments and job duties rather than simply the job title.

The OPM policies for qualification do actually address this situation and make a provision for the cases when a portion of an employee's assigned duties may be professional in nature even though they are operating in a position categorized in a technician series. In the OPM's policy for Application of Qualification Standards the section titled Experience Requirements contains the following guidance:

Federal employees are assumed to have gained experience by performing duties and responsibilities appropriate for their official series and grade level as described in their position description. However, experience that would not normally be part of the employee's position is creditable when documented by satisfactory evidence (e.g., a memorandum from the manager or human resources director, SF-52, or other documentation). Similarly, experience gained in the Federal service under a misassignment or improper appointment is given the same credit as experience under a

Case Study:
***Not Qualified for a Position
Already Held?***

After more than 20 years of experience in the agency an employee is promoted from her position as a GS-0023-12 Forest Recreation and Wilderness Program Manager. She is highly respected in the wilderness management field at a national and international level. Her new position is that of her previous supervisor and she now oversees her former position. The 0401 series is used to fill her old position at the GS-11/12 level while she is now a GS-0301-13.

Even though the position this highly qualified employee successfully held was converted to a 0401 series, the employee is not qualified for any 0401 series positions – including her old job. Viewed through the qualification lens of HR, she has no professional series experience and her liberal arts degree fails to meet the 0401 education requirement. This case study exemplifies our broken and bureaucratic system that prevents a highly qualified candidate from being considered for a job which they are unquestionably capable and well suited.

proper appointment if the applicant submits satisfactory evidence to substantiate his/her claim.²

This direction is infrequently used as is another OPM policy which allows individuals to qualify solely on specialized experience in the absence of relevant coursework³. Attempts to allow any experience gained under a technician series to assist in qualifying for a professional series job have generally resulted in failure. The possible reasons for this failure are numerous. HR specialists have a tremendous volume of applications to process and cannot afford to look past the job series to properly assess whether accomplishments and duties from non-0401 positions should be creditable. Another factor that several HR staff members have noted is that recent audits by the OPM showed that USFS HR specialists had been too loose in their interpretation of the qualification standards for the 0401 series. If the issue were left unchecked it is possible that the OPM would rescind the hiring authority that has been extended to the USFS. As a result there has been a tightening of their interpretation and HR specialists seem to most often err on the conservative side when making judgments.

The fundamental issue related to experience-based qualification is that there is no bridge between technical field-based wilderness jobs and professional wilderness management jobs, even when the work assignments overlap substantially and when technicians have successfully demonstrated professional-level competency.

Education-Based Qualification

The two standard options (A and B described above) for qualification for a position in the 0401 series both include a positive education requirement. Translated, an applicant must possess either a degree in a discipline appropriate to the position or coursework in a relevant field equivalent to a major. The second major issue with the use of

Case Study: Audits for Existing Employees

In some cases employees working in permanent positions under the 0401 series have been red-flagged through an internal audit as not possessing the education and/or experience to perform their current position despite performance ratings that suggest otherwise. One of these individuals has been in two 0401 positions for a total of four years when he is told that his position needs to be reclassified to something for which he is better qualified. He retains his job and pay grade but what does he do when he looks for his next position which is likely to be in the 0401 series? His colleague in another Region but in a similar position is also told that he has been red-flagged but has heard nothing more for six months. Every day he wonders about his fate.

² U.S. Office of Personnel Management, Policies and Instructions, General Policies: E. Application of Qualification Standards, 3. Experience Requirements, d. Crediting Experience, retrieved April 30, 2012 from: <http://www.opm.gov/qualifications/policy/ApplicationOfStds-03.asp>

³ U.S. Office of Personnel Management, Group Coverage Qualification Standards for Professional and Scientific Positions, retrieved April 30, 2012 from: <http://www.opm.gov/qualifications/standards/group-stds/gs-prof.asp>

the 0401 series is that the degrees or coursework that are most applicable to the work performed are not acceptable to those assessing qualifications. Although a wilderness manager position may be advertised in the 0401 series, relevant coursework in important areas such as wilderness planning, recreation management and public policy do not count toward the requisite 24 credit hours of specialized coursework. As a result an applicant with a wilderness management degree is routinely told that they are not qualified for the job. Because the 0401 series is rooted in biology an applicant with a degree in fish biology or veterinary science is deemed qualified.

One contributing factor is that Human Resources specialists are removed from the people and the jobs they assess. Ideally position descriptions and OPM standards could be accurately applied from afar. The reality is that the jobs that many of us do are poorly captured by the abstract application of this framework. Without an accurate perception of what wilderness management entails it is impossible for staffing specialists to make decisions on which courses are most relevant or what experience relates to the job.

Recreation, interpretation and fire management have all been utilizing the 0401 series and have made advances to address education-related qualification issues. Although all three program areas are still implementing these changes, those made by recreation are the most recent and the most relevant to the wilderness management program because many positions that have significant wilderness-related duties also have nonwilderness recreation-related duties. First, managers looking to fill professional recreation positions are strongly encouraged to use newly classified position descriptions (PDs) that utilize not only the 0401 but also the 0101 (Social Science) and 0807 (Landscape Architecture) series. These PDs have been developed for GS-12 and 13 positions and it is expected that by the end of summer 2012 there will be PDs classified for GS- 07, 09 and 11 positions. These PDs are based on core competencies that were developed by subject matter experts in consultation with USFS HR staff. This type of interdisciplinary advertisement is designed “to reach the broadest and most qualified applicant pool.”⁴ Although a greater number of applicants may be considered as a result of this interdisciplinary

Case Study: Qualifying Education

An applicant for a GS-0401-07/09 wilderness management position has earned a BS in social sciences and an MS in wildland recreation management. She has a small amount of relevant experience and seeks to qualify based on her education. She is selected from the referral list but upon analysis by HR it is determined that she lacks 24 credit hours of biological sciences despite her advanced degrees and thus cannot be considered for the job. The other applicants on the list that are deemed qualified are a former veterinarian, a retired botanist and a young man who recently graduated with a BS in microbiology. None of these three have any experience or coursework in wilderness management. Who would you rather hire to manage an area that received congressional wilderness designation?

⁴ Letter from James S. Bedwell, USFS Director of Recreation, Heritage, and Volunteer Resources, to all Regional Foresters, entitled “Interdisciplinary Position Description (PD) Instructions” dated February 23, 2012.

listing, it still fails to reach many capable and dedicated wilderness employees holding degrees in disciplines other than biology and social science. The issue of which degrees or types of coursework are acceptable remains unaddressed. Lastly, this approach will only help if all related positions on each rung of the career ladder are advertised in the same fashion.

A second change that would be beneficial would be the creation of a list to define specific subject areas where coursework would be considered relevant. This has been a major hurdle for wilderness management positions because the requisite 24 hours of specialized coursework have usually been limited to those courses taken in the biological sciences. A course in zoology or microbiology will currently count toward the 24 credit hours but courses in wilderness management or recreation management will not. On May 27, 2010 Jim Bedwell, Director of Recreation, Heritage, and Volunteer Resources, sent out a letter titled "Implementation of the GS401 series for Interpretive Specialists and Interpretive Work." Attached to this letter was a series of questions and answers including "What type academic courses can be used for meeting the 24 credits?" The list includes geographic information systems (GIS), land use planning, and environmental law. When fire began implementing a shift to the 0401 series subject matter experts worked with the OPM to develop a document titled "Supplemental Qualifications Standards, GS-401 Fire Management Specialist." This document includes "natural resource related disciplines as determined by Fire Management subject matter experts to meet the Natural Science Group GS-400." The disciplines listed include environmental sciences, outdoor recreation and earth sciences. While relevant to Fire and Interpretation 0401 series, none of the disciplines mentioned are deemed relevant to the vast majority of staffing specialists who have assessed the qualifications for applicants to 0401 wilderness management positions though coursework in each area would better equip a wilderness manager for the job. Without clear direction about what subjects are pertinent, aspiring wilderness management professionals will continue to have relevant coursework discredited.

Case Study: Arbitrary Assessments

A long time wilderness employee has 14 credits of graduate-level wilderness management coursework through the University of Montana and 10 credits of upper-level environmental science/applied GIS coursework through the University of Alaska. An HR Staffing Specialist in Albuquerque credits the employee with 24 credits meeting the 0401 positive education requirement allowing him to fill a temporary promotion to a GS-9-0401 position. While successfully detailing in the position, an HR Staffing Specialist in Alaska only recognizes 14 of the credits, and considers him unqualified for filling the GS-9-0401 position permanently.

The University of Montana courses are a popular and well respected source of graduate level wilderness management coursework but their acceptance for qualification varies between HR staffing specialists. With no guidance as to which courses are creditable for 0401 Natural Resources Specialist (Wilderness/Recreation Manager) positions, there is no consistency in determining whether employees are qualified.

In order to protect their highly valued decision space, HR qualification experts will not commit to a verdict on whether or not a specific course counts as one of the 24 credits *until* a candidate is being reviewed for hire. Because of this there is a dearth of information that will allow tomorrow's leaders to plan the development needed to reach their targeted positions. Even if they are told that a course will count toward qualification, the same ruling may not be made by the HR staffperson who reviews the applicant's transcript when they are being considered for a position.

Hiring Authorities

To fully understand the hiring process one must become familiar with the authority under which the Forest Service fills its vacancies. When the Wilderness Act was signed in 1964 all candidates for Forest Service positions applied through the OPM. The Civil Service Reform Act of 1978 initiated a change and eventually OPM delegated hiring authority to the Forest Service. Most vacancies are now generally advertised and filled under two different titles related to their specific hiring authorities— Merit and Demo.

Applicants who are currently working in a permanent federal position for more than three years or who have held a permanent federal position for over three years have met a service requirement to have them considered "career employees" or employees with "federal status". The Merit Promotion System uses the agency's direct hire authority to limit the consideration of applicants to only those with federal status. On top of the baseline qualification standards associated with the position being filled, applicants must also meet time in-grade requirements within 30 days of the closing date of the vacancy. From an applicant's perspective the benefits of this hiring approach are generally related to the smaller pool of applicants and the removal of veteran's preference as a factor in candidate selection. The primary drawback is that in order to be considered the applicant must meet the time-in grade requirement as well as the qualification standards for the position to be filled.

Some current employees who meet the minimum education requirements for a vacancy may not be considered for a position advertised under the Merit authority. The authority only applies to permanent employees so long-term seasonal employees are automatically excluded from consideration. Additionally, permanent employees may be excluded if they do not meet the time-in-grade requirement. For example, an employee with a relevant master's degree and a wealth of experience outside the agency will not be eligible for a position advertised under the Merit authority if they have not spent one year working in a federal position at the next lowest grade. (It is important to note that experience and time-in-grade are two separate requirements. An employee who has worked for five years as a permanent GS-0462-08 may meet the time-in-grade requirement for a GS-0401-09 but may not qualify if HR staff determines that they lack the requisite amount of specialized experience.)

For those without federal status the USDA Demonstration Project, or Demo hiring authority as it is widely known, has become the sole source for external competitive appointment of employees into the Forest Service. There is no time-in-grade requirement as there is with Merit hiring but veteran's preference does apply under Demo procedures. There has been growing concern about the Demo authority as a means of applying for a job because there are a growing number of veterans seeking

employment and it is unclear what effect this may be having on candidates without veteran's status. Additionally, an agency-instituted hiring pause began in July 2011 which further affects those applying for Forest Service positions. This pause does not affect internal candidates but it does make hiring external applicants more difficult as all selections of GS-1 to GS-13 candidates new to the Forest Service require approval by the Executive Leadership Team.

Impacts to Tomorrow's Leaders

As a direct result of the issues surrounding the use of the 0401 series, there are a great number of employees who feel trapped in the technician series with no opportunities for advancement. High quality employees are considering leaving the agency for work in the private sector where their skills, experience and education are more highly valued and a growing number are realizing that this may be the only feasible option for advancement. Such a realization has serious implications for employee morale and retention.

Employees who decide to complete additional coursework in order to qualify are faced with a difficult choice—should I take the course more useful for my target position or the one that is not relevant but will surely count toward my requisite 24 credit hours? The current system encourages employees to take the classes that are less applicable and if done with training dollars, they're wasting taxpayer money to develop irrelevant skills.

The use of an unmodified, existing series to fill positions for which it was not designed, paired with a lack of clear direction has made the qualification system arbitrary and capricious. The best case scenario is that a portion of the workforce is disgruntled while some occasionally benefit from its subjective nature. The worst case scenario is that the majority of the workforce is disgruntled and grievances are filed against the agency.

In response to one Forest's letter seeking clarification about the qualification process, a letter from the HR division was dominated by ambiguous "sometimes" and "maybes." It does little in the way of generating faith when the phrase "there is no clear answer to this" is used multiple times by the specialists who are supposed to provide 30,000 employees with guidance. Instead it disenfranchises high caliber employees striving to do quality work and to rise according to their abilities. It is impossible to overstate how corrosive this is to employee morale.

Summary of Past Efforts to Institutionalize a Wilderness Career Path

The Arthur Carhart National Wilderness Training Center invested two years working with key wilderness specialists from all four of the Federal land management agencies to identify technical core competencies and the knowledge, skills, and abilities (KSAs) needed by wilderness stewards. By 2005, these had been endorsed by the wilderness program leaders in all four agencies and adopted by the Interagency Wilderness Steering Committee as the official competencies for wilderness stewardship.

These competencies were intended to guide employee development, direct competency-based training programs, and support a wilderness career path.⁵

In 2005, OPM issued guidance on the implementation of the Job Family Standard for Professional Work in Natural Resources Management and Biological Sciences Group GS-0400. Pursuant to this guidance, Human Capital Management and the Albuquerque Service Center had converted fire management positions to this new professional series by 2008. The Army Corps of Engineers had also initiated an agency-wide conversion of its recreation and interpretive specialists to this series, and the Bureau of Land Management and Fish and Wildlife Service began to show interest in taking similar action. These events and the conspicuous absence of a career path for recreation professionals, prompted the Forest Service to consider converting many of its existing recreation, wilderness, and interpretive employees to the new GS-0401 series. Prior to the introduction of the GS-0401 series wilderness employees were classified under a variety of series including GS-0023 (Outdoor Recreation Planner), GS-0025 (Park Ranger), or GS-1001 (General Arts and Information). These series are often not perceived as professional because there is no positive education requirement.

The USFS originally asked the OPM to create new occupational series for the Fire and Recreation (under which Wilderness is generally included) programs, but the OPM persuaded the agency to adopt the existing 0401 series:

The U.S. Department of Agriculture (USDA) and the Department of the Interior (DOI) requested the establishment of new occupations for fire program management and recreation science, respectively. Alternatively, they asked that we establish fire program management and recreation science as options under the General Natural Resources Management and Biological Sciences Series, 0401.

In discussions with USDA and DOI, we noted that if employees were placed in fire program management and recreation science occupations, those employees might have difficulty qualifying for positions in other 0400 professional occupations. Both USDA and DOI wanted the flexibility to move personnel into and out of the fire program and recreation science activities. Accordingly, they agreed to use the 0401 series for the two activities.

We instruct agencies to use series 0401 when work of a position matches work of the occupational group, but does not match any occupation in the group. To meet agencies' needs, we have added narrative descriptions of fire program management and recreation science (which we refer to as recreation management) to the description of the 0400 occupational group. Agencies that have fire program management and recreation science work that matches

⁵ Interagency Wilderness Steering Committee, Wilderness Technical Core Competencies, retrieved April 30, 2012 from <http://www.wilderness.net/index.cfm?fuse=NWPS&sec=competencies>.

*the work of the 0400 occupational group will not find a matching occupation in the group. By default, agencies may classify the work to series 0401.*⁶

Efforts to convert wilderness employees to the GS-0401 series were met with some resistance. In October 2008, a high-level representative from the National Park Service (NPS) stated, “trying to squeeze professional recreation managers into the biologist/natural resource manager box would be a mistake.” He went on to say, “if recreation managers had to possess biologist credentials as has been proposed, Howard Zahniser (primary architect of the Wilderness Act) would not be qualified to be a wilderness manager.” The new OPM guidance recognized recreation management as a significant resource management function and, thus, as a profession. But, the path forward was not clear.

Another high-level agency representative from the Bureau of Land Management (BLM) responded by stating that the GS-0401 series was precisely the right track for wilderness professionals but noted that current position descriptions and the positive education requirement might present challenges. He proposed using GS-0401 in conjunction with GS-0023 and GS-0025, depending on the duties and responsibilities of a given position. Rather than constraining the wilderness profession to the biological sciences, he argued that it should be expanded to include the social sciences as well. The BLM went on to draft recreation position descriptions for GS-0401-05 through 12.

The NPS generally uses the GS-0025 series for most wilderness positions since most wilderness-related responsibilities are collateral within a broader park ranger job. The 0025 series is technical in the lower grades and then administrative in the upper grades. A few wilderness-specific positions exist within the agency under titles such as “Wilderness Coordinator” or “Wilderness Specialist.” These positions are usually filled at the GS-11 level using the 0401 series but other series are still used. The 0025 series presents an appealing option for use by the Forest Service but agency culture has had a hard time swallowing the idea of labeling a national forest employee as a “park ranger.”

Recommended Actions

Recommended Action: *Consult with OPM officials regarding the issues related to the use of the 0401 series and determine the potential for making the changes necessary to address said issues within the series.*

Discussion: USFS agency leadership should share this report, along with several testimonials from affected personnel in various programs, with the OPM. The 0401 series has proven to be a poor fit for positions in a variety of fields for which it was not designed. Fire, Wilderness, Recreation, Special Uses and Lands are all having difficulty applying the 0401 series. The narrative descriptions in the 0401 series for Fire and Recreation, in particular, are not explicit enough to ensure consistent interpretation of

⁶ U.S. Office of Personnel Management, Professional Work in the Natural Resources Management and Biological Sciences Group, 0400, September 2005, p.96.

qualification standards, and well-qualified candidates are having difficulty qualifying for positions. Without substantial modification for these functional areas, the 0401 series fails to serve as mechanism for professional recruitment and development in wilderness management. Before any changes are made to the existing staffing strategy Forest Service leadership must discuss with the OPM whether or not there is the flexibility within the 0401 series to accommodate the adjustments needed to address the issues identified in this report.

There is recent direction to advertise Recreation positions in an interdisciplinary fashion, adding the 0101 and 0807 series to the 0401 series. The intent of this direction is to avoid “excluding candidates who would be qualified to manage recreation programs.”⁷ However, simply adding two more series without modification to the 0401 series fails to provide an opportunity for all qualified candidates to be considered. Other program areas are also realizing that multiple-series, interdisciplinary advertisements are a short-term, work-around solution that addresses some, but not all, of their concerns. In the absence of uniform agency direction, this approach is being utilized inconsistently, multiplying a lack of consistency across the nation and programs.

Considerations:

Pros:

- The OPM is the authority on job classifications and qualifications and thus has great potential to help resolve the issue.
- The issue may be expanded to include the other three wilderness management agencies, which may result in a long-term, consistent solution that would serve the entire wilderness profession.

Cons:

- Taking the issue directly to another agency (OPM), however appropriate, may be regarded as political maneuvering and possibly resented by some who are invested in the current application of the 0401 series.
- If the issue draws attention from the other three wilderness management agencies, a solution may take much longer, not serve the Forest Service well, or not be achieved.

Time Required (workload):

- 5 days spread over 2 months planning the meeting
- 2 hours for the meeting
- 4 hours of follow-up work after the meeting (notes, action items)

Resources Required (people, funding):

- WAG Wilderness Career Ladder Task Team for continued work
- Travel and per diem costs for WAG representation
- USFS Wilderness Director or Program Leader

⁷ U.S. Office of Personnel Management, Professional Work in the Natural Resources Management and Biological Sciences Group, 0400, September 2005, p.96.

- Wilderness leadership from other agencies, as appropriate
- OPM representation at the appropriate level for resolving the issue

Steps	Responsible Parties
Identify Wilderness Program & WAG representatives appropriate to a meeting w/OPM	WAG Representative & Wilderness Director
Identify OPM representative appropriate to a meeting w/USFS	Wilderness Director
Identify protocol for conducting an inter-agency meeting	Wilderness Director
Determine meeting pre-work, logistics, and agenda	WAG Representative
Conduct meeting	All Attendees
Capture notes and action items from the meeting & report to WAG	WAG Representative

Keys to Implementation:

- Support and participation from senior-level leadership in the Wilderness Program
- Focus on resolving the issue rather than on presenting it
- Appropriate WAG representation at any meeting with OPM on this subject
- Emphasis on explicit qualification standards, if the 0401 series is retained for Recreation

Recommended Action: *Consult with the Merit System Protection Board regarding 0401 series career ladder issues and seek a remedy.*

Discussion: As an alternative to, or in addition to, consulting with the OPM, it may be fruitful to present this report and case studies to the Merit System Protection Board (MSPB). The MSPB is the authority that ensures that codified employment practices are properly implemented. The MSPB also conducts studies to reinforce this goal. As the penultimate authority on the matter, any response from the MSPB would provide clarification and weight. (The ultimate authority is the federal court system that can affirm or overturn MSPB cases.)

Considerations:

Pros:

- The MSPB would provide an objective review by a third party that is concerned only with whether employment practices are being carried out correctly.
- The issue may be expanded to include the other three wilderness management agencies, which may result in a long-term, consistent solution that would serve the entire wilderness profession.

Cons:

- Taking the issue directly to another agency (MSPB), however appropriate, may be regarded as political maneuvering and possibly resented by some who are invested in the current application of the 0401 series.

- If the issue draws attention from the other three wilderness management agencies, a solution may take much longer, not serve the Forest Service well, or not be achieved.

Time Required (workload):

- 4 days spread over 1 month developing the case based on this report and associated resources
- 3 days of follow-up with the MSPB and develop action items that result from their review.

Resources Required (people, funding):

- WAG Wilderness Career Ladder Task Team representative
- USFS Wilderness Director or Program Leader

Steps	Responsible Parties
Develop a clear and well documented case to bring before the MSPB	WAG Career Ladder Task Team representative & USFS Wilderness Director or Program Leader
Deliver this case to MSPB	USFS Wilderness Director or Program Leader
Meet with MPSB representative to discuss issue, answer questions and develop next steps	USFS Wilderness Director or Program Leader
Share MSPB ruling on case with WAG	USFS Wilderness Director or Program Leader

Recommended Action: *Convert all wilderness positions to a series within the 0300 General Administrative, Clerical, and Office Services occupational group.*

Discussion: As an alternative to modifying the 0401 series, the decision to even use this series needs to be revisited. Contrary to initial direction to move toward the 0401 series, Fire is now moving away from it for all positions except the highly specialized Prescribed Fire and Fuels Specialist.⁸ Fire positions at or below the GS-8 level are being advertised in the 0462 series and managerial positions (typically GS-9 thru GS-15) will be advertised in the 0301 series.

Moving certain GS level positions away from the professional scientist 0401 series to a more appropriate series may be the most practical response if another existing series more accurately matches the work done by those in the wilderness management field. One occupational group that may provide a fit is the 0300 General Administrative, Clerical, and Office Services group. According to OPM “this group includes all classes of positions the duties of which are to administer, supervise, or perform work involved in management analysis...”⁹ Some series within the 0300 group have the same pay and two-grade

⁸ For examples of Fire moving to 0301 administrative series positions, see [here](#) and [here](#).

⁹ U.S. Office of Personnel Management, Handbook of Occupational Groups and Families, August 2001, retrieved April 15, 2012 from <http://www.opm.gov/fedclass/text/gs-0300.htm>

advancement as the 0401 professional series without the rigorous scientific academic qualification standard. These positions may be classified as administrative rather than professional in nature. OPM summarizes administrative work as:

Administrative Work

Administrative work involves the exercise of analytical ability, judgment, discretion, and personal responsibility, and the application of a substantial body of knowledge of principles, concepts, and practices applicable to one or more fields of administration or management. While these positions do not require specialized education, they do involve the type of skills (analytical, research, writing, judgment) typically gained through a college level education, or through progressively responsible experience.

Administrative work may be performed as a part of the principal mission or program of an agency or subcomponent, or it can be performed as a service function which supports the agency's mission or program. Employees engaged in administrative work are concerned with analyzing, evaluating, modifying, and developing the basic programs, policies, and procedures which facilitate the work of Federal agencies and their programs. They apply a knowledge of administrative analysis, theory, and principles in adapting practice to the unique requirements of a particular program.

Administrative occupational series typically follow a two-grade interval pattern.¹⁰

The Wilderness Act of 1964, the foundation for wilderness management, uses the terms “administer” and “administration” multiple times.¹¹ Wilderness rangers and managers commonly apply practices from multiple fields and coordinate various agency programs when administering wilderness areas. The paramount charge of upholding wilderness character comprises unique requirements for the particular program of Wilderness which meets the above description of administrative work.

Proponents of the 0401 series sometimes argue that wilderness management needs recognition as a legitimate profession and a job series classified as professional is one step toward that end. Although the words “professional” and “administrative” have connotative meanings that may place more value or prestige on the former, within the Forest Service such is not necessarily the case. The science-based agency regularly promotes employees from professional series positions into highly respected administrative positions when it hires district rangers. Line officers, like wilderness managers, need to apply analytical ability, a substantial body of knowledge, and sound judgment when balancing numerous resource values across a wide range of situations. The administrative academic criterion requires any four-year college degree for qualification at the GS-5 level and then an additional year of graduate

¹⁰ U.S. Office of Personnel Management, Introduction to the Position Classification Standards TS-134 July 1995, TS-107 August 1991 Revised: August 2009, pp.9-10.

¹¹ for example: Wilderness Act, 1964, 16 U.S.C. 1131(a) & (b); 16 U.S.C. 1133(b) & (c).

school for each two grade increment thereafter.¹² The experience criteria include the general experience demonstrating a capability to:

1. Analyze problems to identify significant factors, gather pertinent data, and recognize solutions;
2. Plan and organize work; and
3. Communicate effectively orally and in writing.¹³

Additional Knowledge, Skills and Abilities may be applied as well.¹⁴

There are a number of existing series within the 0300 job family that may be suitable for positions in the wilderness management field and additional analysis will be required to determine which series provides the best fit.

Considerations:

Pros:

- Disenfranchised but capable employees (those with 4-year college degrees) will have an opportunity to ascend.
- Line officer positions and fire positions are converting to 0300 series positions, so precedent exists.

Cons:

- 0301 work would not help an employee qualify for an 0401 job; thus employees would have few options to ascend beyond wilderness – unless there was a wholesale change across many disciplines to 0300 series jobs.

Time Required (workload):

- Depends on whether this is attempted agency-wide or unit-by-unit. Considering the overall difficulty with hiring and qualifying applicants anyhow, the unit-by-unit approach seems more feasible since this would be no more difficult than normal hiring.
- Such conversion might best take place over several years with position descriptions rewritten from 0401s to 0301 positions as they become vacant. The time involved would then be the time it takes to rewrite a position description and get it approved. As this is happening to a large degree with the new eRecruit system, which requires new position descriptions, it could be argued that the time taken is little more than the time it takes to fill positions currently.
- It must also be noted that it is very arduous to have a position description approved at this time.

¹² U.S. Office of Personnel Management, Group Coverage Qualification Standards for Administrative and Management Positions, retrieved April 15, 2012 from <http://www.opm.gov/qualifications/Standards/group-stds/gs-admin.asp>

¹³ Ibid.

¹⁴ Ibid.

Unit-by-Unit Steps	Responsible Parties
Draft 0301 wilderness position descriptions	Rec/Wilderness Staff Officer
Get 0301 PD's approved	HR
Advertise and fill 0301 PD's	Rec/Wilderness Staff Officer + Line Officer

Recommended Action: *For positions remaining in the 0401 series, create a Supplemental Qualification Standard for the U.S. Department of Agriculture, Forest Service and the U.S. Department of the Interior GS-0401 Natural Resources Specialist, covering both Recreation Management Specialists and Wilderness Management Specialists.*

Discussion: The OPM has created a [Supplemental Qualification Standard document for the 0401 Fire Management Specialist position](#).¹⁵ This document details the experience that qualifies for each two grade interval. It also lists creditable degree majors and disciplines of study that count toward the academic qualification requisite of the position. Lastly, it specifically details criteria for meeting the option of qualifying based on a combination of education and experience.

This document elaborates helpfully on the imprecise language concluding the positive education requirement of the 0401 series (“or related disciplines appropriate to the position”) as well as on what experience helps a candidate qualify. Having such elaboration for the Recreation/Wilderness positions would clarify the qualification process significantly.

Considerations:

Pros:

- Defines what degrees and courses may be used to qualify for a Recreation Management or Wilderness Management Specialist position advertised in the 0401 series.
- Reduces inconsistencies in the qualification process.
- Clarifies career path steps for employees and managers.

Cons:

- Increases the probability that courses and degrees not listed would be considered as inappropriate for qualification; therefore, the list of acceptable degrees and courses must be comprehensive.

Time Required (workload):

- Two months by project leader working on this as their primary task

Resources Required (people, funding):

¹⁵ U.S. Office of Personnel Management, Supplemental Qualification Standard for the U.S. Department of Agriculture, Forest Service and the U.S. Department of Interior, 401 Fire Management Specialist, retrieved April 15, 2012 from http://www.ifpm.nifc.gov/Archives/401/GS-0401Supplemental_Qualification_Standard_w-Attachments_July_2005.pdf

- Project leader could be a WO staff person, Presidential Management Fellow, detailer or temporary staff working on a leadership project
- Involvement of wilderness and recreation program directors from the USFS (and potentially other agencies)
- Involvement of subject matter experts from wilderness and recreation management academia
- Involvement of HR qualification specialists to provide input from the perspective future users of the Supplemental Qualification Standard
- Possible involvement from select universities and colleges to determine currently listed courses relevant to recreation and wilderness management
- Minimal contributions for staff in the USFS fire program who helped establish the Supplemental Qualification Standard document for the 0401 Fire Management Specialist position

Steps	Responsible Parties
Consult with USFS fire program staff who helped establish the Supplemental Qualification Standard document for the 0401 Fire Management Specialist position to share lessons learned.	Project leader
Consult with wilderness and recreation management subject matter experts to determine what types of courses and degrees align with the core competencies for wilderness and recreation management.	Project Leader
Provide a draft Supplemental Qualification Standard to the WAG, regional wilderness program managers and regional recreation directors for review.	Project Leader
Utilize feedback to edit document as necessary	Project Leader
Deliver Supplemental Qualification Standard to USFS WWSR Director and Recreation Director for signature and delivery to the OPM.	Project Leader
USFS Recreation Director and/or WWSR Director meet with OPM to make the case for the creation of the new Standard	USFS Recreation Director and/or WWSR Director

Recommended Action: *Create an HR Qualification Checklist/Worksheet for GS-0401 Recreation/Wilderness Management Specialists.*

Discussion: At one time, the USFS fire program developed an HR Qualification Checklist/Worksheet for GS-0401 Fire Management Specialist. This document showed how HR scores a candidate applying for a position based on detailed examination of the candidate's education and experience. Each detail had a line for checking off a qualification as met or for scoring the appropriate number of semester hours. Perhaps most importantly, the document was shared by HR and the applicant, as noted explicitly at the end:

HUMAN RESOURCES SPECIALIST: Provide a copy of this worksheet to the applicant as a record of the rationale for your determination.

APPLICANT: Provide a copy of this document when applying to future announcements for the same position as identified on the first page. Questions should be directed to the specialist whose signature appears above.

Creating similar documents for 0401 professionals who work in Recreation and/or Wilderness would go a long ways toward establishing a transparent qualification process and toward ensuring consistency in applying qualification standards. It may be worth creating a checklist for any 0300 series positions as well, though this may not be necessary as the criteria are less rigorous.

Considerations:

Pros:

- Allows transparency in the qualification process
- Documents decisions so that future qualifiers have access to job series-related case history and raise the consistency concerning how qualification standards are being interpreted
- Provides feedback to applicant on what areas he/she should focus future professional development

Cons:

- Creates a reactionary tool that is most helpful to applicants after position selection

Time Required (workload):

- Two weeks

Resources Required (people, funding):

- Willing HR qualifications expert
- Wilderness or Recreation Project Leader (Could be WO staff or someone on a project detail)

Steps	Responsible Parties
Review the HR Qualification Checklist/Worksheet for GS-0401 Fire Management Specialist and determine if it as acceptable for use as a template.	Project Leader
Draft a similar version with a focus on recreation and wilderness management positions in the GS-0401 series.	Project Leader
Review of draft checklist/worksheet by HR qualifications expert.	HR qualifications expert
Revise and submit HR Qualification Checklist/Worksheet for GS-0401 Wilderness and Recreation Management Specialist to OPM for approval and implementation.	Project Leader

Recommended Action: *Count the Professional Wilderness Management Curriculum of Arthur Carhart National Wilderness Training Center toward education qualifications for GS-0401 positions.*

Discussion:

The Arthur Carhart National Wilderness Training Center currently offers [courses specifically designed to empower professional wilderness managers](#) and these courses were designed around the wilderness management core competencies developed by subject matter experts. However, these courses do not count toward meeting the experiential or educational qualifications for the GS-0401 Natural Resources Specialist. It would be worth discussing with the OPM the merit of recognizing courses that would empower and qualify capable employees to successfully fill GS-0401 Natural Resources Specialist positions.

Considerations:

Pros:

- Those courses that are best tailored to meet the core competencies of professional wilderness and recreation management would begin to be counted toward meeting minimum education qualifications.
- This refocuses the qualifications issue back to the forgotten point that qualifications should be about ensuring that someone is capable of doing the job.

Cons:

- Would raise the cost of the trainings which are currently free thereby decreasing the likelihood that employees will take advantage of these offerings. This could be remedied by having a “for credit” option so that the training would remain free for those employees who are not interested in obtaining academic credits.

Time Required (workload):

- The time for this depends on OPM’s response regarding what it would take to credit these courses.

Resources Required (people, funding):

- Willing education institution to serve as host for these credit-bearing courses. The Eppley Institute for Parks and Public Lands at Indiana University currently partners with the Carhart Center to provide these online courses so they are a likely partner. The University of Montana already works with the Carhart Center and Wilderness.net on many education projects and they may be a willing partner if Indiana University is unable to offer a for credit option.
- Time from Carhart Center staff to work with educational institution representatives

Steps	Responsible Parties
Review Carhart’s currently offered courses to determine how each course would translate in terms of credit hours and appropriate rubric	USFS Carhart Rep and educational institution representative
Share crosswalk of courses and proposed crediting structure with	USFS Carhart Rep and educational

HR qualifications expert for review	institution representative
Make any changes necessary to the crediting structure	USFS Carhart Rep
Offer courses for credit	Educational institution

Recommended Action: *Establish guidelines as to when and how Human Resources will count technical experience toward qualifying for a professional position.*

Discussion: The OPM acknowledges that it can be difficult distinguishing between technical and professional work:

It is important to determine whether a position is comprised of technical or professional work. It is not always easy to differentiate between the two because some tasks are common to both. The developmental work of professional positions and the demanding work of high level technical positions are sometimes similar.¹⁶

Indeed, the OPM used to count technical work experience toward qualifying for a professional position, but this practice was discontinued in the mid-1990's.¹⁷ The unfortunate consequence is that many lower grade wilderness personnel in the 0462 technician series accomplish professional grade work, such as administering permits and working on management plans, without recognition during the hiring process.

Yet the OPM does allow for experience outside of one's series to be credited:

Federal employees are assumed to have gained experience by performing duties and responsibilities appropriate for their official series and grade level as described in their position description. However, experience that would not normally be part of the employee's position is creditable when documented by satisfactory evidence (e.g., a memorandum from the manager or human resources director, SF-52, or other documentation). Similarly, experience gained in the Federal service under a misassignment or improper appointment is given the same credit as experience under a proper appointment if the applicant submits satisfactory evidence to substantiate his/her claim.¹⁸

Guidelines, approved by the OPM and adopted by Human Resources, need to be written elaborating the process by which employees with professional experience gained while working under a technical series will be credited for their accomplishments.

¹⁶ U.S. Office of Personnel Management, Professional Work in the Natural Resources Management and Biological Sciences Group, 0400, *Distinguishing Between Professional and Technical Work*, September 2005, p.7.

¹⁷ Personal communication with HR specialist, February 10, 2012.

¹⁸ U.S. Office of Personnel Management, Policies and Instructions, General Policies: E. Application of Qualification Standards, 3. Experience Requirements, d. Crediting Experience, retrieved April 16, 2012 from: <http://www.opm.gov/qualifications/policy/ApplicationOfStds-03.asp>

Considerations:**Pros:**

- Reinstates a rung in the career ladder whereby an employee can gain practical experience AND receive credit for said experience during the hiring process.
- This will benefit numerous employees who conduct professional duties while working under the technician series.

Cons:

- There will likely be consternation that many in technician series are doing professional duties. This is reality, but it also reflects a disparity between OPM standards and practice (i.e. people doing professional duties should be in professional job positions). There may be reluctance to reveal the breadth of this disparity.

Time Required (workload):

- Two months by project leader working on this as their primary task

Resources Required (people, funding):

- Project leader could be a WO staff person, Presidential Management Fellow, detailer or temporary staff working on a leadership project
- HR staffing expert willing to invest a substantial amount of time to develop something that is easily interpreted by qualifications specialists
- OPM reviewer

Steps	Responsible Parties
Discuss shortcomings of current system	Project leader and HR staffing expert
Develop guidelines elaborating the process by which employees with professional experience gained while working under a technical series will be credited for their accomplishments	Project leader and HR staffing expert
Submit draft guidelines to OPM for review and feedback	Project leader
Once approved by the OPM develop materials to assist with the roll-out of the guidelines so that they are quickly and effectively adopted by HR	Project leader
Roll-out guidelines	Project leader and HR staffing expert

General Hiring Reforms Which Would Positively Impact the Wilderness Career Ladder

1. Allow federal departments and agencies to determine that recruitment shortages exist and directly hire candidates without ranking.¹⁹

The director of the OPM should forward draft legislation to Congress to allow the OPM, and departments and agencies, to establish categories in which candidates can be directly hired to coincide with the establishment of decentralized, agency-based hiring systems.

Federal departments and agencies would have the authority to directly hire candidates without ranking when recruitment shortages exist after considering the following factors, as applicable:

- the failure of recent efforts to recruit high-quality candidates for similar positions,
- recent turnover in similar positions,
- labor market factors that may negatively impact the ability of the agency to recruit high-quality candidates for similar positions now or in the future, or
- special qualifications needed for the position that are in short supply.

The OPM should establish additional categories where candidates may be directly hired, for example, persons with targeted disabilities, candidates with outstanding academic qualifications, or other categories as appropriate.²⁰

2. Allow nonpermanent employees to compete for permanent positions under agency procedures for internal placement.²¹

Work with the OPM to draft legislation to Congress to allow nonpermanent employees who were initially hired using competitive procedures to be considered along with internal candidates for permanent positions being filled under merit promotion. Following two years of performance that meets established expectations within a five-year period, temporary NTE and temporary indefinite employees will be permitted to apply to be considered for selection and appointment to permanent positions under internal placement procedures. Within 30 days of enactment, OPM should issue appropriate guidelines for implementation.²²

¹⁹ This suggestion, cited almost verbatim, comes from the National Partnership to Reinvent Government program, Reinventing Human Resource Management: HRM01 Create a Flexible and Responsive Hiring System, retrieved April 16, 2012 from: <http://govinfo.library.unt.edu/npr/library/reports/hrm01.html>

²⁰ This suggestion, cited almost verbatim, comes from the National Partnership to Reinvent Government program, Reinventing Human Resource Management: HRM01 Create a Flexible and Responsive Hiring System, retrieved on April 16, 2012 from: <http://govinfo.library.unt.edu/npr/library/reports/hrm01.html>

²¹ Ibid.

²² Ibid.

If the 0401 series positions endure, then classifying them as GS-7/9s combined with the above allowance for temporary seasonals to compete, especially with the aforementioned crediting of professional grade experience, will restore several of the lowest career ladder rungs that are currently missing.

3. Abolish the time-in-grade requirement. Create a general qualifications framework that permits agencies to augment or modify qualification standards for both internal and external placement actions.²³

The director of the OPM should revise the regulations to abolish the time-in-grade requirement. In addition, the OPM should revise its guidance concerning government-wide qualification standards. The OPM should continue to implement a framework of generic qualification standards that permits agencies to identify and develop experience requirements for specific series. Agencies would be permitted to modify standards for both external and internal placement actions, including promotions, when the agencies determine that candidates can successfully perform the work of the position although they may not fully meet the qualification requirements in the generic standards. Agencies may augment standards with selective placement factors (for example, foreign language proficiency) but may not require additional amounts of education or experience beyond those required by the standards. Decisions to either augment or modify standards should be made before vacancy announcements are issued and will be publicized in the announcement.²⁴

²³ Ibid.

²⁴ This suggestion, cited almost verbatim, comes from the National Partnership to Reinvent Government program, Reinventing Human Resource Management: HRM01 Create a Flexible and Responsive Hiring System, retrieved on April 16, 2012 from: <http://govinfo.library.unt.edu/npr/library/reports/hrm01.html>