

**U.S. Office of Personnel Management  
Office of Merit Systems Oversight and  
Effectiveness  
Classification Appeals and FLSA Programs**

Washington Oversight Division  
1900 E Street, NW., Room 7675  
Washington, DC 20415-6000

**Classification Appeal Decision  
Under section 5112 of title 5, United States Code**

**Appellant:** [name]

**Agency classification:** Program Analyst  
GS-343-12

**Organization:** Office of Investigations  
Office of the Inspector General  
[department]  
Washington, D.C.

**OPM decision:** GS-1802-9  
(title at agency discretion, with  
“Supervisory” prefix)

**OPM decision number:** C-1802-09-01

/s/February 27, 2001

\_\_\_\_\_  
Linda Kazinetz  
Classification Appeals Officer

\_\_\_\_\_  
Date

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a classification certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the Government. The agency is responsible for reviewing its classification decisions for identical, similar, or related positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under the conditions and time limits specified in title 5, Code of Federal Regulations, sections 511.605, 511.613, and 511.614, as cited in the *Introduction to the Position Classification Standards*, appendix 4, section G (address provided in appendix 4, section H).

### **Decision sent to:**

**Appellant:**

**Agency:**

## **Introduction**

On December 11, 2001, the Washington Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from [appellant], who is employed as a Program Analyst, GS-343-12, in the Office of Investigations, Office of the Inspector General (OIG), [department], in Washington, D.C. [Appellant] requested that her position be classified as GS-343-13. This appeal was accepted and decided under the provisions of section 5112 of title 5, United States Code.

An on-site position audit was conducted by a Washington Oversight Division representative on January 30, 2001. This appeal was decided by considering the audit findings and all information of record furnished by the appellant and her agency.

## **Position Information**

The appellant is the Chief, Investigative Services, and is responsible for performing and supervising support work related to the receipt and processing of allegations received by the OIG and other associated tasks. The appellant monitors the OIG hotline operation, to include receiving written and telephonic allegations, determining if the allegation pertains to [department] and if not, forwarding it to the appropriate Federal, State, or local agency, and inputting the allegation to the Case Data System. After OIG management has decided which cases will be accepted, the appellant prepares or supervises the preparation of referral letters to the designated bureaus or OIG field offices, periodically inputs status updates on investigations to the database, and follows up on the submission of bureau responses on referrals. The appellant performs or supervises the performance of "name check" database searches, which is in effect an automated vetting process for grant applicants, award nominees, political appointees, and individuals scheduled to meet with the Secretary. She also performs other automated record checks to support OIG investigations and audits, including the FBI's National Crime Information Index (NCIC), Dunn and Bradstreet reports, and credit bureau inquiries. The appellant oversees the maintenance, retrieval, scanning, and archival of investigative files, with personal responsibility for the safeguarding of sensitive and classified materials. She performs database queries and prepares various reports related to the OIG case load. The appellant is also responsible for the provision of general administrative support to the OIG, including mail distribution, time and attendance recording, preparation of training requests, SF-52's, and travel forms, and obtaining office supplies.

The appellant's position description, [number], is not usable for classification purposes. A position description serves as a statement of the major duties, responsibilities, and supervisory relationships of a given position and must include information about the job which is significant to its classification. It should clearly define the major duties assigned and the nature and extent of responsibility for carrying out those duties. It should include enough job-specific information that the proper classification can be made.

The appellant is assigned to a standard GS-343-12 position description. The duties listed consist solely and entirely of the following: analyzing and evaluating on a quantitative/qualitative basis the effectiveness of line program operations; evaluating and advising on organization structures, methods, and procedures; analyzing management information requirements; developing, analyzing, and evaluating new or modified program/management policies, regulations, and goals; and developing procedures and systems for assessing the effectiveness of programs/management processes. The appellant does not perform *any* of these duties, not even from a very general functional standpoint. Therefore, this evaluation is based on the position information provided in the desk audit, including the appellant's written description of the tasks she performs and associated work samples.

## **Series Determination**

The appellant's position should not be classified to the Management and Program Analysis Series, GS-343. This series includes positions which serve primarily as staff analysts and advisors to management on the effectiveness and efficiency of program operations. The primary purpose of the work in this series is to provide line managers with objectively based information for making decisions on the administrative and programmatic aspects of agency

operations and management. The types of work performed by positions in this series may include such functions as: performing cost benefit or economic evaluations of programs; analyzing new or proposed legislation or regulations for program impact; conducting productivity studies and recommending changes in organization, staffing, and work methods; identifying resources required to support varied levels of program operations; and developing specifications for new management information systems. Positions in this series serve in a staff capacity and are not involved in the conduct or delivery of the line or mission-oriented work of the organization. The appellant's duties bear no resemblance to GS-343 work. Rather, she performs support work that is directly associated with the organization's investigative function.

The position should be classified to a one-grade rather than a two-grade interval series. Guidance on distinguishing between work that properly follows a one-grade or two-grade pattern, as presented in both the Introduction to the Position Classification Standards and the Classifier's Handbook, is as follows:

The one-grade interval series represent clerical or support work. Work of this nature involves general office or program support duties such as preparing, receiving, reviewing, and verifying documents; processing transactions; maintaining office records; locating and compiling data or information from files; and storing or manipulating information in databases. Support work usually involves proficiency in certain limited phases of a specified program. Employees who perform support work follow established methods and procedures. Support work can be performed based on a *practical* knowledge of the purpose, operation, procedures, techniques, and guidelines of the specific program area or functional assignment.

Two-grade interval administrative work, on the other hand, requires a *high order* of analytical ability combined with a *substantial* body of knowledge related to the principles, concepts, and practices applicable to an administrative or management field. It requires comprehensive knowledge of the methods used to gather, analyze, and evaluate information, skill in applying problem solving techniques, and skill in communicating effectively both orally and in writing. Administrative work involves such functions as planning for and developing systems, functions, and services; formulating, developing, recommending, and establishing policies, operating methods, or procedures; and adapting established policy to the unique requirements of a particular program. The primary skill requirements are not the ability to carry out established procedures and processes, but rather to analyze a given issue or case assignment both to ascertain the facts *and* to determine the actions necessary to achieve the required results; to conduct research for the purposes of gathering additional information, identifying options, and determining regulatory requirements; to prepare written products including findings and conclusions; and to explain, defend, or promote the results of the work to others.

The appellant is engaged exclusively in one-grade interval work. Her duties do not require a *high order* of analytical ability, *substantial* knowledge of the principles and practices of investigative work, or *highly-developed* writing skills. The appellant performs a limited review of written allegations received in the office, sufficient to identify the basis for the allegation. For allegations received telephonically, she questions the complainant only to the extent necessary to obtain basic information related to the incident, such as pertinent names, dates, and organizational locations. She does not have the authority to screen these allegations, except for those that are clearly not under [department] purview. Her writing is limited to preparing one-paragraph summaries of the allegations for insertion in boilerplate transmittal letters. Reading written allegations in order to extract basic information is not synonymous with *analyzing* those allegations. This work provides some limited aid to the investigators or respondents by stating the nature of the allegation within the body of the transmittal letter, but does not otherwise contribute directly to the investigation itself. Her work is in effect a *processing* operation in that she receives all allegations directed to the office, enters them in a database, prepares brief transmittal letters to the responsible investigating or responding offices as directed, and follows-up on their progress and completion.

The work is most closely associated with the Compliance Inspection and Support Series, GS-1802, which includes positions which perform or supervise technical support to inspections or investigations such as searching for, gathering, screening, and providing factual information or explanations related to the subject of an inspection or investigation, where the tasks are performed following prescribed or established procedures to assist inspectors, investigators, and program officials in their factfinding or program administration responsibilities. The work includes such activities as obtaining background information on subjects of investigations by means of record searches, structured interviews, automated information retrieval, telephone inquiries, or correspondence; providing

information on the status of particular investigations; compiling final investigative reports with necessary exhibits; and maintaining required administrative reports on topics such as manpower, case load, and case status.

### **Title Determination**

There are no prescribed titles for positions in the GS-1802 series. Therefore, the agency may construct an appropriate title, although it must include the "Supervisory" prefix since the position meets the criteria for evaluation as a supervisory position under the General Schedule Supervisory Guide.

### **Grade Determination**

#### *Evaluation of Nonsupervisory Duties*

There are no published grade-level criteria for the GS-1802 series. The standard instructs that nonsupervisory work in this series be evaluated by reference to standards for one-grade interval occupations that involve analogous knowledge and skills.

The appellant's nonsupervisory duties were evaluated by applying the criteria in the Equal Opportunity Assistance Series, GS-361, dated November 1981. This standard was selected for application because it describes work that is highly analogous to the appellant's duties in many respects, such as interviewing complainants to obtain factual information, summarizing information, writing narrative reports, and compiling statistical data.

This standard is written in the Factor Evaluation System (FES) format, under which factor levels and accompanying point values are to be assigned for each of the following nine factors, with the total then being converted to a grade level by use of the grade conversion table provided in the standard. The factor point values mark the lower end of the ranges for the indicated factor levels. For a position to warrant a given point value, it must be fully equivalent to the overall intent of the selected factor level description. If the position fails in any significant aspect to meet a particular factor level description, the point value for the next lower factor level must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level.

#### *Factor 1, Knowledge Required by the Position*

This factor measures the nature and extent of information an employee must understand in order to do the work, and the skills needed to apply that knowledge.

The knowledge required by the appellant's position meets Level 1-4. At that level, work requires an intensive knowledge of rules, operating procedures, and practices of an activity or area to identify relevant information during factfinding, select a course of action for obtaining information, or advise a complainant on procedural aspects; skill in writing to prepare reports and letters; and skill in factfinding and analysis to obtain, organize, and report relevant information. This includes skill in interviewing persons to obtain facts and opinions in stressful situations, and analytical skill in organizing information and making and reporting conclusions.

This level accurately represents the appellant's responsibility for manning the hot line, which consists in effect of interviewing complainants to obtain basic facts about the allegations; for writing summaries of allegations for insertion in transmittal letters; and for preparing statistical reports.

The position does not meet Level 1-5. At that level, work requires detailed practical knowledge of a complex body of regulations, procedures, and precedent decisions to answer complex technical questions or solve technical problems routinely handled by the office; skill in factfinding and analysis to identify and summarize relevant information and compare the facts to general principles or regulations; and skill in writing to prepare detailed narrative reports and letters summarizing findings and conclusions of work assignments.

Whereas Level 1-4 involves gathering information through interviews and other factfinding techniques, Level 1-5 includes the additional requirement that the employee actually draw conclusions from that information, e.g., whether the actions reported in the allegations were proper. The appellant is not required or authorized to make any

judgments on the acceptability or veracity of the allegations received. Her role is limited to questioning the complainant on the basic facts pertinent to the allegation, sufficient to inform the investigator on the basic substance of the allegation and the names and locations of the involved parties.

Level 1-4 is credited.

550 points

*Factor 2, Supervisory Controls*

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work.

The level of responsibility under which the appellant works is comparable to Level 2-3 (the highest level described under this factor). At that level, the supervisor defines objectives and sets deadlines, and assists the employee with unusual problems that do not have clear precedents. The employee plans and carries out the work in accordance with instructions, policies, or accepted practices. Completed work is reviewed in terms of results achieved, technical soundness of completed work or recommendations, and the effect of the work in facilitating the objectives of the office or program.

The appellant carries out ongoing or recurring work independently in accordance with established procedures and time frames. Those aspects of the work involving personal interactions do not lend themselves to direct review, but transmittal letters are reviewed for clarity and completeness, and the quality of her work in an overall sense is reviewed for the degree to which it facilitates the investigators' work.

Level 2-3 is credited.

275 points

*Factor 3, Guidelines*

This factor covers the nature of the guidelines used and the judgment needed to apply them.

The guidelines used by the appellant match Level 3-3 (the highest level described under this factor). At that level, guidelines consist of oral and written office procedural manuals, technical manuals (such as an investigation manual), and a variety of technical instructions governing the program. Judgment is required in deciding which guide applies to a particular situation. The employee uses judgment in deciding on the appropriate courses of action during interviews of complainants or witnesses, or during similar meetings.

The guidelines governing the appellant's work are of a procedural rather than a regulatory or policy nature. However, the appellant must use judgment in such instances as determining what specific information to obtain from complainants based on the nature of the allegation; identifying where to forward allegations that do not relate to the [department]; and deciding whether information obtained in automated background checks is serious enough to be reported to the investigators.

Level 3-3 is credited.

275 points

*Factor 4, Complexity*

This factor covers the nature, number, variety, and intricacy of the tasks or processes in the work performed, the difficulty in identifying what needs to be done, and the difficulty and originality involved in performing the work.

The complexity of the appellant's work is comparable to Level 4-2. At that level, assignments are to solve routine problems of limited complexity, gather and provide factual information, or perform tasks in support of higher level specialists. An illustration of Level 4-2 work provided in the standard is as follows:

Typical assignments include interviewing parties to a discrimination complaint to obtain routine factual information and summarizing the information; searching files and records for relevant documentary evidence; analyzing employment statistics and preparing narrative summaries;

writing replies to correspondence; preparing short papers based on information obtained from office files or standard references; or answering questions of the general public, complainants, or respondents concerning program objectives, jurisdiction, and procedures.

This basically expresses the difficulty level of the appellant's work, e.g., questioning complainants to obtain basic facts regarding the allegations and summarizing this information for insertion in transmittal letters; conducting automated records searches on individuals; and preparing various reports on office case load.

The position does not meet Level 4-3. At that level, assignments involve solving complex problems where the employee must determine the relevance and importance of a large number of facts or questions and to make generalizations based on facts, conditions, and program requirements. An illustration of Level 4-3 work provided in the standard is as follows:

The employee may investigate and prepare a report on a charge of discrimination involving a single respondent and one or a few simple issues such as failure to hire or failure to rent an apartment because of race.

This level is intended to cover work situations where the employee performs some limited case assignments, or at least assists specialists in carrying out aspects of their reviews or investigations. The appellant has no responsibility of this nature.

Level 4-2 is credited.

75 points

*Factor 5, Scope and Effect*

This factor covers the relationship between the nature of the work, and the effect of the work products or services both within and outside the organization.

The scope and effect of the appellant's work match Level 5-2. At that level, work involves applying regulations, guides, and procedures to answer factual questions, solve factual problems, or gather necessary information. The work affects the accuracy, reliability, or acceptability of further processes.

The purpose of the appellant's work is to obtain basic information relating to, for example, a particular allegation or individual under investigation. The services performed affect the subsequent work of the investigators in following up on allegations or conducting background checks on individuals or companies.

The position does not meet Level 5-3. At that level, work requires treating a variety of routine problems or situations in conformance with established criteria, such as reviewing recurring complaints where ample precedents exist, conducting factfinding to fill in information gaps, and recommending disposition of the case. The work affects the procedural practices of outside organizations or the resolution of individual complaints.

The appellant's work does not involve resolving problems. She mans the OIG hot line, gets as much specific information from complainants as possible, and passes this information on to others. Her work does not have any external impact, nor does it affect the actual disposition or resolution of allegations.

Level 5-2 is credited.

75 points

*Factor 6, Personal Contacts*

This factor includes face-to-face and telephone contacts with persons not in the supervisory chain.

The appellant's personal contacts meet Level 6-3 (the highest level described under this factor), where contacts are with persons from outside the employing agency, such as persons being interviewed to obtain information. The appellant has contacts with others from outside the agency, such as complainants and technical staff associated with automated record search systems.

Level 6-3 is credited.

60 points

*Factor 7, Purpose of Contacts*

This factor covers the purpose of the contacts credited under Factor 6.

The purpose of the appellant's contacts meets Level 7-2, where contacts are to plan or coordinate work; resolve administrative problems; or interview persons who are basically cooperative. This accurately characterizes the appellant's contacts with investigative staff and with complainants.

The position does not meet Level 7-3, where the purpose of contacts is to conduct formal interviews of complainants, witnesses, or respondents, or to resolve strongly held opinions or persuade others of a particular course of action. The appellant does not conduct formal interviews. Further, she reports information relating to allegations or background checks on individuals, but does not otherwise try to convince anyone of the significance or import of that information.

Level 7-2 is credited.

50 points

*Factor 8, Physical Demands*

This factor covers the requirements and physical demands placed on the employee by the work situation.

The position matches Level 8-1, which covers sedentary work.

Level 8-1 is credited.

5 points

*Factor 9, Work Environment*

This factor considers the risks and discomforts in the employee's physical surroundings or the nature of the work assigned and the safety regulations required.

The position matches Level 9-1, which describes a typical office environment.

Level 9-1 is credited.

5 points

*Summary*

| <u>Factors</u>       | <u>Level</u> | <u>Points</u> |
|----------------------|--------------|---------------|
| Knowledge Required   | 1-4          | 550           |
| Supervisory Controls | 2-3          | 275           |
| Guidelines           | 3-3          | 275           |
| Complexity           | 4-2          | 75            |
| Scope and Effect     | 5-2          | 75            |
| Personal Contacts    | 6-3          | 60            |
| Purpose of Contacts  | 7-2          | 50            |
| Physical Demands     | 8-1          | 5             |
| Work Environment     | 9-1          | <u>5</u>      |
| Total                |              | 1370          |

The total of 1370 points falls within the GS-7 range (1355-1600) on the grade conversion table provided in the standard.

### *Evaluation of Supervisory Duties*

The appellant's supervisory duties were evaluated by applying the criteria in the General Schedule Supervisory Guide (GSSG). This is a cross-series guide used to determine the grade level of supervisory positions in the General Schedule. The GSSG has six evaluation factors, each with several factor level definitions and corresponding point values. Positions are evaluated by crediting the points designated for the highest level met under each factor, and converting the total to a grade by using the grade conversion table provided in the guide.

#### *Factor 1, Program Scope and Effect*

The element *Scope* addresses the complexity and breadth of the program directed and the services delivered. The geographic and organizational coverage of the program within the agency structure is included under this element.

Under *Scope*, the position meets Level 1-1 in terms of the complexity of the work directed and the organizational coverage of the work. At that level, the work directed is procedural, routine, and typically provides services or products to specific persons or small, local organizations. By comparison, the appellant supervises one-grade interval support work that involves the provision of services (e.g., filing, data input, mail distribution) primarily to the OIG investigative staff.

Level 1-2 is not met in terms of complexity of the work directed. At that level, the work directed is administrative, technical, complex clerical, or comparable in nature (e.g., budget, staffing, supply, maintenance, protective, or payroll services). The work supervised by the appellant is one-grade interval in nature, but it would not be characterized as "complex clerical." It does not require knowledge of specialized regulations (as would the work of a personnel or procurement clerk, for example) or of the procedures involved in processing many different kinds of transactions (such as the type of work performed by a payroll or supply clerk). Level 1-2 is also not met in terms of organizational coverage of the work, where the services provided support the activities of a typical agency field office, area office, small to medium military installation, or comparable activities. Examples provided in the guide include a small military base, typical national park, hospital, or nondefense agency field office of moderate size. The appellant's work supports primarily the OIG Office of Investigations, with a staff of about 20 investigators. This is not comparable in either size or complexity of operations to any of the organizational entities listed above. The Office of Investigations has one basic mission-related function. This is distinguished from, for example, a military base with a variety of supply and maintenance responsibilities, or a national park with its associated resource management, interpretation, and law enforcement functions, either of which would have a serviced population numbering in the hundreds.

The element *Effect* addresses the external impact of the program.

Under *Effect*, the position matches Level 1-1, where the work directed facilitates the work of others in the immediate organizational unit, responds to specific requests or needs of individuals, or affects only localized functions. The purpose of the work supervised by the appellant is to facilitate the work of the investigators and to respond to specific requests by the investigative staff for information or administrative support. The position does not meet Level 1-2, where services significantly impact other functions and activities throughout the organizations supported. The appellant's work facilitates rather than directly impacts the work of others in the sense intended in the guide.

Level 1-1 is credited.

175 points

#### *Factor 2, Organizational Setting*

This factor considers the organizational situation of the supervisory position in relation to higher levels of management.

The appellant's immediate supervisor is one level below the first SES position in the chain of command, consistent with Level 2-2.

Level 2-2 is credited.

250 points

*Factor 3, Supervisory and Managerial Authority Exercised*

This factor covers the delegated supervisory and managerial authorities exercised on a recurring basis.

The appellant's delegated supervisory authorities and responsibilities fully meet Level 3-2c in its description of various first-level supervisory functions, such as planning, assigning, and evaluating work; counseling employees; developing performance standards; and providing for training and developmental needs. Level 3-3 is not met as it applies either to managerial positions with significant program authority or to second-level or higher supervisors.

Level 3-2 is credited.

450 points

*Factor 4, Personal Contacts*

This is a two-part factor which assesses the nature and purpose of the personal contacts related to supervisory and managerial responsibilities. The nature of the contacts, credited under subfactor 4A, and the purpose of those contacts, credited under subfactor 4B, must be based on the same contacts.

*Subfactor 4A, Nature of Contacts*

The appellant's contacts meet Level 4A-2, where contacts are with managers, supervisors, and staff throughout the bureau level of the agency and with members of the business community or the general public. This describes the appellant's contacts with OIG managers and staff and with complainants from both inside and outside the agency.

Level 4A-3 is not met, where contacts are with high ranking managers and technical staff at bureau levels, with departmental administrative staff, or with comparable personnel in other agencies. These contacts take place in meetings and conferences and often require extensive preparation of briefing materials or up-to-date technical familiarity with complex subject matter. The appellant's regular and recurring contacts are with supervisors and staff within the OIG. She does not have contacts with high-level staff from outside the OIG, and there is no requirement in her work to attend meetings and conferences where she would be briefing those individuals or discussing complex technical matters.

Level 4A-2 is credited.

50 points

*Subfactor 4B, Purpose of Contacts*

The purposes of the appellant's contacts are consistent with Level 4B-2 (i.e., ensuring that information provided to outside parties is accurate and consistent, planning and coordinating work), in that the purpose of her contacts is to transmit materials (such as investigative cases) and provide information (such as the results of database searches) to others.

Level 4B-3 is not met, where the primary purpose of the contacts is managerial in nature, such as representing the organizational unit in negotiations, in obtaining or committing resources, *and* in gaining compliance with policies, regulations, or contracts. At Level 4B-3, the contacts usually involve active participation in conferences, meetings, and hearings involving problems or issues of considerable consequence or importance to the program. The appellant has no responsibilities of this nature.

Level 4B-2 is credited.

75 points

*Factor 5, Difficulty of Typical Work Directed*

This factor measures the difficulty and complexity of the basic work most typical of the organization directed, that constitutes 25 percent or more of the workload of the organization.

The appellant supervises two GS-8 investigative assistants (one position under recruitment) and one GS-6 investigations clerk. Given the above grade-level analysis under the GS-361 standard, GS-7 is considered the highest level of nonsupervisory work performed in the office and constitutes at least 50 percent of the office workload.

Level 5-4 is credited.

505 points

*Factor 6, Other Conditions*

This factor measures the extent to which various conditions contribute to the difficulty and complexity of carrying out supervisory duties, authorities, and responsibilities.

The appellant's position meets Level 6-2, where the work supervised involves technical or support work comparable in difficulty to GS-7 or GS-8. Additional credit may be given for special situations, which include such complicating work conditions as variety of work supervised, shift operations, fluctuating workforce, physical dispersion of the workforce, special staffing situations, constantly changing technology, and hazardous working conditions, but none of these apply to the appellant's work situation.

Level 6-2 is credited.

575 points

*Summary*

| <u>Factors</u>                   | <u>Level</u> | <u>Points</u> |
|----------------------------------|--------------|---------------|
| Program Scope and Effect         | 1-1          | 175           |
| Organizational Setting           | 2-2          | 250           |
| Supervisory/Managerial Authority | 3-2          | 450           |
| Personal Contacts                |              |               |
| Nature of Contacts               | 4A-2         | 50            |
| Purpose of Contacts              | 4B-2         | 75            |
| Difficulty of Work Directed      | 5-4          | 505           |
| Other Conditions                 | 6-2          | <u>575</u>    |
| Total                            |              | 2080          |

The total of 2080 points falls within the GS-9 range (1855-2100) on the grade conversion chart provided in the GSSG.

**Decision**

The appellant's nonsupervisory work supports no higher than the GS-7 level, but her supervisory duties and responsibilities are evaluated at the GS-9 level and are grade-controlling.

The appealed position is properly classified as GS-1802-9, with the title at agency discretion but including the "Supervisory" prefix.