



Justification for New Cultural Resources Management Group in OPM Job Series Classification (Legacy 15-713)

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Abstract

Military installations are often frustrated with their inability to hire the best-qualified cultural resources personnel due to gaps and/or inconsistencies in hiring guidelines. The issue at hand is twofold. First, existing Office of Personnel Management (OPM) guidelines for hiring federal workers do not include job series classifications for cultural resources managers (CRMs), architectural historians, or historic preservationists—three critical jobs in the cultural resources field. Second, the job classifications that are currently being used to hire cultural resources personnel are poorly organized within the OPM job series classifications and do not properly align with the *Secretary of the Interior's Historic Preservation Professional Qualifications Standards (Standards)*.¹ This project was funded to review OPM's job classification system as it pertains to cultural resources and then, to propose a new job classification group specific to the needs of cultural resources management, as well as to develop position classification standards for CRMs, architectural historians, and historic preservationists. This Technical Note presents the need and justification for OPM to create a new Cultural Resources Management Group Job Series, inclusive of new and updated job series classifications for cultural resources management positions.

Project Specifics

This note presents the work done through a Department of Defense (DoD) Legacy Resource Management Program (LRMP) project undertaken by the Engineer Research and Development Center–Construction Engineering Research Laboratory (ERDC-CERL): Project 15-713 "Job Series Classification Guidance Document." A related LRMP project was also undertaken by ERDC-CERL that influenced the current project: Project 13-713 "Create Job Series Description for Architectural Historian and Cultural Resources Manager."

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Partners: Department of the Interior National Park Service, Department of Defense, Environmental Management Functional Community Working Group

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¹ *Secretary of the Interior's Historic Preservation Professional Qualification Standards*, as expanded, revised, and officially adopted in 62 FR 33708 (Washington, DC: Secretary of the Interior, 20 June 1997).

Purpose/Need

The Department of Defense (DoD) has over 19,000 historic buildings that require regular historic and architectural analyses to meet the requirements of federal legislation. In addition, there are more than 31,000 archeological sites on DoD lands. The DoD, as one of the largest land holders in the United States, is responsible for what may be the largest collection of cultural resources and historic properties in the United States. Currently, land-managing federal agencies are challenged in their ability to hire the best qualified cultural resources personnel to ensure that federal agencies remain compliant with federal law. This challenge is the result of outdated OPM classification standards for cultural resource management positions that no longer meet the needs of federal agencies. While OPM covers a few occupations under their own job series, such as archeologist and anthropologist,, other critical positions such as historical landscape architect and architectural historian are poorly defined specialties in the OPM Handbook. In addition, historic preservationist and cultural resources manager (CRM) are not listed at all. So for example, while archaeologists have the training and expertise to identify and manage archaeological sites, they most likely do not have the expertise to make materials and maintenance decisions for historic buildings in the way an architectural historian would. The absence of OPM classifications for critical cultural resources management positions makes hiring the best-qualified personnel in these professions difficult, if not impossible in some instances.

The federal OPM hiring process involves several components. In brief, the process includes *position descriptions*, which describe the “major duties, responsibilities, and supervisory relationships of a position,” and can be tailored to the specific needs of an agency (i.e., the need for an architectural historian who specializes in evaluating buildings for eligibility to the NRHP); *position descriptions* must then be aligned to OPM job *classifications* and *qualifications*. OPM job *classifications* provide a “system for objectively and accurately defining and evaluating the duties, responsibilities, tasks, and authority level of a job” and are used to determine the appropriate pay system, grade/pay band, occupational series, and official title of a federal position.² Job *qualifications* are standards that describe the minimum requirements, such as educational, medical, age, experience, etc., for each job classification series (e.g., “historians” must have degrees in history; “archaeologists” must have degrees in archaeology). No matter how a *position description* is written, because job *classifications* and *qualifications* for architectural historian, historic preservationist, or CRM do not currently exist in the OPM system, agencies still have issues with hiring best-qualified personnel for these positions. Applicants’ job backgrounds differ between what employers need and what they are able to fill with existing job classifications. For example, the architectural historian job position would be currently classified as either a “historian (architect)” or “historian,” even though the training, background, and professional experience required for these two positions under OPM guidance may be very different from that of an architectural historian. Therefore, new job classifications and qualifications are needed to facilitate

² Office of Personnel Management, “Introduction to the Position Classification Standards – OPM,” <https://www.opm.gov/fedclass/gdintro.pdf>; accessed December 8, 2017.

federal hiring of cultural resources personnel who are best qualified according to the professional standards and qualifications set forth in the Secretary of the Interior's *Standards*. This project was undertaken to evaluate the existing OPM system for hiring cultural resources management personnel and to recommend updating and improving the system to meet the current needs of federal agencies with land-management responsibilities. . Articulating and explaining the need and justification for this recommendation is an important first step in the process.

Approach

Researchers engaged in meetings with Department of Interior and DoD agencies to assess specific needs for cultural resources personnel and existing challenges these agencies face in hiring the best-qualified personnel to meet these needs. This process involved determining how many federal agencies utilized cultural resources and historic preservation positions, as defined in the NPS *Standards*. Researchers examined government materials on occupations in the federal government, and followed up with various federal agencies via e-mail and telephone to assess which agencies utilize the cultural resources positions and how the agencies were able to hire personnel to fill these positions.

Researchers also reviewed existing OPM guidance documents and met with human resources personnel in order to better understand the OPM system, in particular the hiring process. As part of these meetings, researchers conducted a notional exercise of creating a job announcement for an architectural historian using existing OPM hiring processes. This allowed researchers to better understand the various components of the OPM system. The professional standards and qualifications published by the NPS were also reviewed in order to evaluate how current OPM classifications compare. The NPS *Standards* are published to guide federal land managing agencies in identifying the best qualified personnel for cultural resources management and to facilitate compliance with NHPA federal mandates. Understanding the gap between OPM classifications and NPS *Standards* helps to elucidate the challenge federal land managing agencies currently face in their ability to hire the best qualified cultural resources personnel.

Results

Results from this research highlighted that the Department of the Interior, the DoD, the Department of Energy, the General Services Administration, the Veterans Administration, the National Aeronautical and Space Administration, the U.S. Postal Service, and the U.S. Forest Service utilize cultural resources positions to the greatest extent, when compared to the other federal agencies. Research also indicated that other than archeologist, the positions of architectural historian and historic preservationist are the two disciplines that cultural resources management offices on military installations seek to hire most. Feedback from installations also indicated that the biggest obstacle to hiring the best-qualified personnel was the OPM classification system because it did not include several critical cultural resources management positions, such as architectural historian, historic preservationist, and CRM. These omissions make hiring the best-qualified personnel in these professions difficult, if not impossible in some instances. OPM job classifications are intended to provide an objective and uniform method for determining the appropriate

pay system, grade/pay band, occupational series, and official title of a federal position.³ They are a critical part of the OPM system and its efforts to promote uniform, consistent practices in federal hiring. Job classifications set forth standards and qualifications that include education, background, and experience, and that must be met in order to meet the requirements of each defined position. To ensure fair and equitable standards in the federal hiring process, job classifications (unlike job descriptions) cannot be customized or altered to meet individual needs in hiring.

In constructing the job announcement, an OPM classifier is limited to the job series defined in the OPM Handbook,⁴ and they must use their own experience and best judgment in selecting which job series best aligns and meets the needs as described in the position description. Often, this process is fairly straightforward, and one or more job series clearly line up with the agency's needs and the job's duties and responsibilities. However, when no single or combination of existing job classifications properly aligns with the desired job description, as is frequently the case with several cultural resources positions, the OPM classifier must essentially shoehorn the job description into an existing job classification. This action creates inefficiencies and obstacles to hiring the best-qualified personnel for cultural resources positions.

Currently, job series that are used to hire cultural resource specialists are scattered across four different job occupational groups under the White Collar Occupational Groups and Series: (1) 0000 – Miscellaneous Occupations Group; (2) 0100 – Social Science, Psychology, and Welfare Group; (3) 0800 – Engineering and Architecture Group; and (4) 1000 – Information and Arts Group. Occupational groups are intended to group similar federal positions together, and job series are a further subdivision of occupational groups. Within these four occupational groups used for cultural resources hiring, there are 12 job series currently available to OPM for classifying cultural resources positions (Table 1). Contributing to the problem is that these job classifications were primarily written before cultural resources management duties and roles were defined and used extensively within the DoD. As a result, significant gaps currently exist within the OPM's classification systems for cultural resources management, including the complete absence of critically needed classifications for CRM, historic preservationist, and architectural historian.

³ Office of Personnel Management, "Introduction to the Position Classification Standards – OPM," <https://www.opm.gov/fedclass/gdintro.pdf>; accessed December 8, 2017.

⁴ Office of Personnel Management. *Handbook of Occupational Groups and Families* (Washington, DC: Office of Personnel and Management, May 2009) <https://www.opm.gov/policy-data-oversight/classification-qualifications/classifying-general-schedule-positions/occupationalhandbook.pdf>.

Table 1. OPM's existing job series for cultural resources under existing job classification groups (indicated in shaded lines).⁵

Series	Title	Year Written	# Non-DoD Federal Employees (2015)
<i>Miscellaneous Occupations Group</i>			
0020	Community Planning Series	1973	399
<i>Social Science, Psychology, and Welfare Group</i>			
0150	Geography Series	1963	574
0170	History Series	1962	244
0190	General Anthropology Series	n/a ⁶	131
0193	Archeology Series	1983	957
<i>Engineering and Architecture Group</i>			
0801	General Engineering Series	2008	9,745 ⁷
0807	Landscape Architecture Series	2008	284
0808	Architecture Series	2008	776
0810	Civil Engineering Series	2008	4,092
<i>Information and Arts Group</i>			
1010	Exhibits Specialist Series	1991	235
1015	Museum Curator Series	1962	336
1016	Museum Specialist and Technician Series	1961	548

Further complicating the hiring process of the best-qualified cultural resources personnel is the computer screening tools used in the OPM hiring process to evaluate applications. These screening tools evaluate how well the language in the application matches the language provided in the job announcement. However, this initial computer screening is a problem for many cultural resources positions because the educational requirements defined by the OPM classification process, which is limited to a set of outdated job series,

⁵ DoD currently has 3 million employees, but there is no way to find what series these employees are under, although series data is listed for all other federal departments (<https://www.federalpay.org/employees/occupations?/employees/occupations/>).

⁶ There is no job series classification standard published for General Anthropology (0190). According to the OPM website, "If a series is not included in this list, we have not issued a specific classification standard for that series. Documents on the [Classifying White Collar Positions](#) webpage provide series definitions and guidance on classifying positions in series with no published standard."

⁷ Although engineering is defined as a job description under the *Secretary of Interior's Professional Qualification Standards*, it is very rare that an engineer is hired for federal cultural resources work.

do not properly line up with the job descriptions and the originating needs of the position. The issue is that the basic education requirements limit the pool of successful applicants to those whose education and/or experience match the qualifications provided by the job classification rather than matching the actual needs of the position. For example, when federal agencies want to hire an architectural historian, the position is typically classified under the History job series or the Architecture job series, which require a degree in history or architecture. Depending on the training and background of a historian or architect, their educational and professional experience can be very different than that of an architectural historian. An architectural historian typically is trained in architectural history and historic preservation, allowing them to evaluate buildings for eligibility in the National Register of Historic Places (NRHP) as well as to apply and interpret the *Secretary of Interiors Standards for the Treatment of Historic Buildings*.⁸ A historian and an architect usually do not have that specialized architectural history training. However, unless the architectural historian has a degree or a background in history and/or architecture that meets the requirements of the job classification, that individual will not make it through the computer screening portion of the OPM application process.

This conflict between the education and training required by the current job classification series and that which is actually required to meet the needs of the job description occurs frequently in the federal hiring process of cultural resources personnel. It is a problem because the OPM standards may not allow for the best-qualified individual to be hired, as demonstrated by the architectural historian example given above. An individual who meets the requirements for the history position must have at least 18 semester hours in the field of history. In a typical university undergraduate degree program, the individual will complete 120 semester hours (or roughly 40 classes), which will include approximately 60 semester hours dedicated to general education and up to 40 hours for the Major requirement, leaving anywhere from 20 to 30 semester hours for electives. The general education requirements and most requirements for Majors are highly structured, with a defined set of classes the individual must complete. As such, a person who earns a degree in history is not left with much freedom to take courses that would qualify them as a specialist in another field. Yet, the current federal hiring process expects this of its applicants—that a person with a degree in history, architecture, geography, archaeology, or any of the other current job series, will also have the equivalent amount of training and experience in architectural history or historic preservation.

Further exacerbating the situation, not all existing OPM standards and qualifications associated with the individual job series used for cultural resources positions (listed in Table 1) meet the professional standards and qualifications as written in the *Standards* provided by the National Park Service (NPS).⁹ As stated earlier, the *Standards* are intended to guide federal agencies in how best to meet the requirements of the National Historic

⁸ Kay D. Weeks and Anne E. Grimmer, *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes* (Washington, DC: U.S. Department of the Interior, National Park Service, 1995).

⁹ National Park Service. "Secretary of the Interior's Historic Preservation Professional Qualification Standards," 36 CFR Part 61, Appendix A. As revised in *Federal Register* 62:119, 33708–33723. (Washington, DC: U.S. Department of Interior, National Park Service, 1997). Online: https://www.nps.gov/history/local-law/arch_stnds_9.htm.

Preservation Act (NHPA),¹⁰ and the professional qualifications that are best suited to evaluating NRHP eligibility. Maintaining federal compliance with the NHPA is the entire reason that federal agencies seek to hire cultural resources personnel. Therefore, it is important not only to understand the guidance provided by the *Standards* but also to implement them to the greatest extent possible when proposing changes to the OPM job classifications.

Recommendations/Lessons learned

Historic preservation fields, as defined by the *Standards*, are not clearly defined by the current OPM *Handbook of Occupational Groups and Families*. The results of this project led researchers to recommend that OPM revise and update their classification system, by incorporating the guidance provided by the *Standards* to create a Cultural Resources Management Group within the OPM Handbook that will facilitate hiring practices in the DoD. The proposed new Cultural Resources Management Group is structured to closely follow the organizational format used in the existing Natural Resources Management and Biological Sciences Group (Series 0400). Creating a Cultural Resources Management Group in the OPM standards will facilitate the hiring of appropriately trained cultural resources personnel by land-managing federal agencies. The job classifications recommended for inclusion in this proposed Cultural Resources Management occupation group will enable federal agencies to more efficiently hire the best-qualified personnel to assist them in remaining legally compliant with the NHPA. Four of the job classifications recommended for inclusion—CRM, Architectural History, Historic Preservation, and General Cultural Resources Management—do not currently exist within the OPM system. Proposed job classifications for CRM, Architectural History, and Historic Preservation were created as part of this Legacy project and are provided in Legacy Tech Note XX-XXX (*Proposing a Cultural Resources Management Group OPM Job Series and Position Classification Standards for Cultural Resources Manager, Architectural Historian, and Historic Preservationist* (Legacy 15-713) It is recommended that additional work be conducted to create a job classification for General Cultural Resources Management. The remaining job classifications recommended for inclusion in the Cultural Resources Management Group already exist within the OPM system, although seven of them are not currently well defined. It is recommended that the classifications not currently well defined in the OPM system—Conservation, Cultural Anthropology, Cultural Geography, Historic Architecture, Historic Landscape Architecture, Historic Preservation Planning, and Curation—be rewritten, using the standards and qualifications provided for each discipline within the *Standards* as guidance.

Communications

Information about project 15-713, and its related LRMP project 13-713, can be found in the following technical reports and technical notes:

- Tooker, Megan, Dawn A. Morrison, and Adam Smith. *Cultural Resources Job Descriptions and Position Classification Standards*. Department of Defense Legacy

¹⁰ National Historic Preservation Act of 1966, as amended. P.L. 89-665, 16 U.S.C. 470 et seq. (Washington, D.C.: 89th U.S. Congress, 1966).

Resource Management Program Project 13-713 and 15-713, ERDC-CERL TR-18-35. Champaign IL: Engineer Research and Development Center, 2018.

- Tooker, Megan, Dawn A. Morrison, and Adam Smith. *Proposing an OPM Cultural Resources Management Group with Additional OPM Job Series and Position Classification Standards for Cultural Resources Manager, Architectural Historian, and Historic Preservationist*. Tech Note: 15-713-1, Department of Defense Legacy Resource Management Program Project 15-713. Champaign, IL: Engineer Research and Development Center, 2018.
- Tooker, Megan, Dawn A. Morrison, and Adam Smith. *Evaluation of Existing OPM Standards and Qualifications for Cultural Resources Positions*. Tech Note: 15-713-3, Department of Defense Legacy Resource Management Program Project 15-713. Champaign, IL: Engineer Research and Development Center, 2018.