



Evaluation of Existing OPM Standards and Qualifications for Cultural Resources Positions (Legacy 15-713)

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Abstract

Federal land-managing agencies have reported frustration with existing Office of Personnel Management (OPM) hiring processes that prevent them from hiring the best-qualified cultural resources personnel. The biggest obstacle is the absence of several critically needed job positions within the OPM guidelines, specifically cultural resources managers (CRMs), architectural historians, or historic preservationists, which are the positions that military installations seek to hire most. Compounding the issue, 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 Legacy Project 15-713 was funded to review and evaluate the existing OPM standards and qualifications for cultural resources 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, and its Environmental Management Functional Community Working Group

Service branch: Department of Defense; all federal agencies

Project dates: September 2016 to September 2017

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).

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Purpose/Need

Federal land-managing agencies are legally mandated to meet the requirements defined by the National Historic Preservation Act of 1966 (NHPA), as amended,² including the Sections 106 and 110 processes for inventorying, evaluating, and determining the effect of federal undertakings on cultural resources. As an example of the magnitude of this requirement, the DoD alone has over 19,000 historic buildings that must undergo periodic architectural surveys and analyses, and a multitude of cultural resources that need evaluation. Indeed, 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. All these resources and properties must be evaluated under the NHPA for their potential eligibility to the National Register of Historic Places (NRHP) before the government can do anything with, to, or on these properties that might significantly or adversely affect them. Identifying, evaluating, and managing cultural resources and historic properties has therefore become a full-time job and in most instances, necessitated a multi-staffed office on military installations as well as across all DoD echelons and all federal agencies.

The Department of the Interior's National Park Service (NPS) is responsible for maintaining the NRHP. To assist federal agencies in complying with the NHPA, the NPS provides guidance on which academic disciplines are best suited to identifying, evaluating, preserving, and managing cultural resources, as well as the standards and qualifications required by professionals within these fields. Thus, cultural resources management fields are clearly defined by the NPS *Standards*, but they are not clearly defined by the OPM's current *Handbook of Occupational Groups and Families*.³ This lack of clarity creates difficulties and obstacles for land-managing federal agencies seeking to hire the best-qualified cultural resources personnel to ensure that federal agencies remain compliant with federal law related to cultural resources. OPM is responsible for managing the hiring process for federal workers, which includes defining job descriptions and classifications, and setting the standards and qualifications required to meet each of the defined job positions. OPM provides a highly structured process for hiring federal workers, and the point of the OPM standards, descriptions, and classifications is to promote uniform, consistent practices in federal hiring. OPM job position

²National Park Service, National Historic Preservation Act of 1966, as amended: <https://www.nps.gov/history/local-law/nhpa1966.htm>.

³ Office of Personnel Management. *Handbook of Occupation Groups and Families* (Washington, DC: OPM, May 2009).

classification standards define federal white-collar occupations, establish official position titles, and describe the various levels of work used to grade the position. These classification standards are a key component in the hiring process—federal agencies can only hire personnel who meet the standards and qualifications that are defined by OPM job classifications.⁴ 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 positions such as CRM, historic preservationist, and architectural historian. This project evaluated the existing OPM classification system as it is applied to cultural resources management positions in order to make recommendations for improving the system.

Approach

Researchers reviewed existing OPM guidance documents and met with human resources personnel in order to better understand the OPM system. Researchers also engaged in meetings with Department of Interior and DoD agencies to assess their specific needs for cultural resources personnel and existing challenges these agencies face in hiring the best-qualified personnel to meet these needs. The DoD discussed the need for creating the architectural historian, historic preservationist, and CRM job descriptions in a variety of meetings during May, June, and July 2014 through the DoD’s Environmental Management Functional Community Working Group. The Department of the Interior held a meeting in May 2014 to discuss the same needs.

Information gleaned from this research was used to understand and evaluate the existing OPM hiring process and classification system. Emphasis in evaluating the existing OPM classification system was placed on determining how well the current OPM job series met the needs of cultural resources management. Because the laws regulating cultural resources management are administered by the NPS, it was important to understand the professional standards and qualifications guidance provided in the *Standards*. This project compared the OPM standards and qualifications to the NPS *Standards* and identified the gaps that exist between them.

Results

Current OPM standards and qualifications for white-collar occupations list 12 job series that are related to cultural resources management (see Table 1). They are listed under four occupational groups (Miscellaneous Occupations Group; Social Science, Psychology, and Welfare Group; Engineering and

⁴ Office of Personnel Management, “About OPM,” <https://www.opm.gov/about-us/> (accessed 6 December 2017).

Architecture Group; and Information and Arts Group). There is no designated Cultural Resources Management Group in the OPM standards. This is likely because the existing OPM classifications were written before cultural resources management personnel’s duties and roles were defined and used extensively within the DoD. The NPS *Standards* also list 12 disciplines recommended for cultural resources management (see Table 2). Although both OPM and the NPS *Standards* each list 12 disciplines associated with cultural resources personnel, they do not line up one for one with each other. Archeology, anthropology, architecture, geography, and exhibit/museum specialists are the predominant OPM job classifications used to hire cultural resources personnel as these are the job classifications whose individual basic requirements (e.g., education degree and experience) more closely align with the disciplines described in the *Standards*. However, none of these OPM classifications include the recommended qualifications and standards listed for architectural historian or historic preservationist as proscribed in the *Standards*. Research indicated that, other than archeologist, architectural historian and historic preservationist are the two disciplines that cultural resources management offices on military installations seek to hire most. The absence of OPM descriptions and classifications for architectural historian, historic preservationist and CRM make hiring the best-qualified personnel in these professions difficult, if not impossible in some instances.

Table 1. OPM’s existing job series for cultural resources under existing job classification groups (indicated in shaded lines), including year each series was written or last updated and number of non-DoD federal employees reported by OPM in this series in 2015⁵.

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

⁵ DoD currently has 3 million employees, but there is no way to find what series these employees are under (although this data is listed for all other federal departments). <https://www.federalpay.org/employees/occupations/?employees/occupations/> (accessed 12 January 2018).

Series	Title	Year Written	# Non-DoD Federal Employees (2015)
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 ¹³
<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

Table 2. All disciplines identified for cultural resources management in the NPS-managed *Standards* document.

Standards – Identified Disciplines
Archaeology
Architectural History
Conservation
Cultural Anthropology
Curation
Engineering
Folklore
Historic Architecture
Historic Landscape Architecture

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](https://www.opm.gov/policy-data-oversight/classification-qualifications/classifying-general-schedule-positions/#url=Standards) webpage provide series definitions and guidance on classifying positions in series with no published standard.” (<https://www.opm.gov/policy-data-oversight/classification-qualifications/classifying-general-schedule-positions/#url=Standards>) (Accessed 1 November 2018).

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.

Standards – Identified Disciplines
Historic Preservation Planning
Historic Preservation
History

For example, an architectural historian has a different educational background than a historian. An architectural historian will have many classes and training in architectural history, materials, and preservation techniques and will have a knowledge base that a historian most likely will not. An architectural historian will be able to answer building materials questions such as suggesting replacement windows that are compatible to the original windows that are no longer present. Similarly, if a federal agency needed to hire a historic preservationist, they would be stymied by the lack of an OPM job classification for this discipline. Currently, if a properly trained historic preservationist applied for a job, they would face challenges in making it through the computer screening process because their background, education, and experience would not align with the existing OPM job classifications for historian or architect—the most likely job series classifications used to hire personnel with expertise in historic preservation.

A cultural resources manager is tasked with the research, inventory, planning, compliance, and treatment of historic and cultural properties (objects, sites, buildings, landscapes, artifacts, etc.) on federal lands. While a historic preservationist may perform the role of CRM, a CRM has responsibilities such as planning and compliance that extend beyond those of a historic preservationist. CRM positions are unique in that, depending upon the amount of resources and staff needed, it may or may not be a supervisory position. CRMs also lack an OPM classification, but they fill a critical role on most, if not all, military installations. Large installations may have a CRM, an architectural historian, several archaeologists, a curator, and a GIS specialist, whereas a smaller installation might have only a CRM. Many times the single CRM is an archeologist (and likely not qualified to handle architectural preservation issues mentioned above). Occasionally, a CRM is a natural resources specialist or historian and may have no experience with architectural history or even archaeology. This mismatch results from the current system wherein OPM job descriptions for CRMs only accept archaeologists. Even though CRMs are not described in the *Standards* as a separate category, interpretation and application of the *Standards* suggest that a person who meets the qualifications of any of the approved disciplines outlined in the *Standards* would also qualify for the CRM position so long as they meet the supervisory standards set forth by OPM.

Benefit

Evaluating the existing OPM classification system for hiring cultural resources personnel identified critical gaps in the OPM system due to the absence of several critical, key positions. The evaluation also revealed that overcoming these gaps to better align OPM standards with the Secretary of the Interior's *Standards* will require creating new job series classifications, as well as modifying and updating existing job series classifications. These new and updated job classifications and qualifications are needed to facilitate federal hiring of cultural resources personnel who are best qualified according to the professional standards and qualifications set forth in the *Standards*. In turn, this update will facilitate the legal compliance of federal land-managing agencies with the NHPA. Additionally, by updating its classification system, OPM will meet its responsibility under Section 306131(a)(1)(B) of the NHPA by adopting the qualifications and standards provided by the Secretary of the Interior and managed by NPS.⁸

Recommendations/Lessons learned

Historic preservation fields, as defined by the Secretary's *Standards*, are not clearly defined by OPM's current *Handbook of Occupational Groups and Families*. The results of this project led researchers to recommend that OPM revise and update their classification system, incorporating the guidance provided by the Secretary's *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 within 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 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 15-713-1 (*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 (Legacy 15-713)*), and it is recommended that additional work be conducted

⁸ NHPA §306131(a)(1)(A-B) and §306131(a)(2); §306131 was formerly known as Section 112, but has been updated as part of the December 16, 2016 amendment to the NHPA.

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 that are 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 by 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 report and technical notes:

- Tooker, Megan, Dawn A. Morrison, and Adam Smith. *Cultural Resources Job Descriptions and Position Classification Standards*. Department of Defense Legacy 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. *Justification for New Cultural Resources Management Group in OPM Job Series Classification*. Tech Note: 15-713-2, Department of Defense Legacy Resource Management Program Project 15-713. Champaign, IL: Engineer Research and Development Center, 2018.