

**REASON FOR THIS POSITION**

|   |  |   |
|---|--|---|
| 1. NEW<br><input checked="" type="checkbox"/> | 2. IDENTICAL ADDITION TO THE ESTABLISHED PD NUMBER (8)<br><input type="checkbox"/> | 3. REPLACES PD NUMBER (8)<br><input type="checkbox"/> |
|---|--|---|

**POSITION DESCRIPTION COVER SHEET**

**RECOMMENDED**

|  |  |                      |                    |
|--|--|----------------------|--------------------|
| 9. TITLE<br>Equal Opportunity Specialist | 5. PAY PLAN (2)<br>GS  | 6. SERIES (4)<br>360 | 7. GRADE (2)<br>13 |
| 8. WORKING TITLE (Optional)              | 9. INCUMBENT (Optional) <i>Gilliam, Kiebert (Hdqt), McConnell, Bradley, Dickerson, Shepley, Vance (Fort Worth)</i> |                      |                    |

**OFFICIAL**

|   |                  |                       |              |                    |                                     |   |                                      |
|---|------------------|-----------------------|--------------|--------------------|-------------------------------------|---|--------------------------------------|
| 10. TITLE<br>Equal Opportunity Specialist | 11. PP (2)<br>GS | 12. SERIES (4)<br>360 | 13. FUNC.(2) | 14. GRADE(2)<br>13 | 15. DATE (mm/dd/yyyy)<br>06/18/2004 | 18. I/A<br><input type="checkbox"/> yes <input type="checkbox"/> No | 17. CLASSIFIER (Name)<br>M.D. Thrash |
|---|------------------|-----------------------|--------------|--------------------|-------------------------------------|---|--------------------------------------|

**18. ORGANIZATIONAL STRUCTURE (Agency/Bureau)**

|   |                                      |
|---|--------------------------------------|
| 1st<br>U.S. Department of Housing & Urban Development           | 5th<br>Systemic Investigation Office |
| 2nd<br>Office of the A/S for Fair Housing and Equal Opportunity | 6th                                  |
| 3rd<br>General Deputy Assistant Secretary                       | 7th                                  |
| 4th<br>Office of the DAS for Enforcement and Programs           | 8th                                  |

**SUPERVISOR'S CERTIFICATION**

I certify that this is an accurate statement of the major duties and responsibilities of the position and its organizational relationships and that the position is necessary to carry out Government functions for which I am responsible. This certification is made with the knowledge that this information is to be used for statutory purposes relating to appointment and payment of public funds and that false or misleading statements may constitute violations of such statute or their implementing regulations.

|  |   |   |                                  |
|--|---|---|----------------------------------|
| 19. SUPERVISOR'S SIGNATURE<br>Hope E. File                         | 20. DATE (mm/dd/yyyy)   | 22. SECOND LEVEL SUPERVISOR'S SIGNATURE<br><i>Jon L. Gant</i> | 23. DATE (mm/dd/yyyy)<br>1/27/04 |
| 21. SUPERVISOR'S NAME<br>Hope E. File                              | 24. SECOND LEVEL SUPERVISOR'S NAME<br>Jon L. Gant   |   |                                  |
| 21a. SUPERVISOR'S TITLE<br>Director, Systemic Investigation Office | 24a. SECOND LEVEL SUPERVISOR'S TITLE<br>Deputy Assistant Secretary for Enforcement and Programs |   |                                  |

**FACTOR EVALUATION SYSTEM**

| FACTOR                  | 25. FLD/BMK | 26. POINTS | FACTOR                 | 25. FLD/BMK | 26. POINTS |       |
|-------------------------|-------------|------------|------------------------|-------------|------------|-------|
| 1. Knowledge Required   | 1-7         | 1250       | 6. Personal Contacts   | 6-4         | 110        |       |
| 2. Supervisory Controls | 2-4         | 450        | 7. Purpose of Contacts | 7-3         | 120        |       |
| 3. Guidelines           | 3-4         | 450        | 8. Physical Demands    | 8-1         | 5          |       |
| 4. Complexity           | 4-5         | 325        | 9. Work Environment    | 9-1         | 5          |       |
| 5. Scope and Effect     | 5-6         | 450        | TOTAL POINTS           |             | 3165       |       |
|                         |             |            |                        |             | GRADE      | GS-13 |

**CLASSIFICATION CERTIFICATION**

I certify that this position has been classified as required by Title 5, U.S. Code, in conformance with standards published by the OPM or, if no published standard applies directly, consistently with most applicable published standards.

|  |  |
|--|--|
| 29. SIGNATURE<br><i>Mylene Thrash</i>                          | 30. DATE (mm/dd/yyyy)<br>1/20/2004       |
| 31. NAME<br>Mylene Thrash                                      | 31a. TITLE<br>Human Resources Specialist |
| REMARKS<br>FLSA (Exempt) FPL (GS-13) OPM PCS for 360 dtd 11/80 | 33. OPM CERTIFICATION NUMBER             |

# MASTER RECORD / INDIVIDUAL POSITION DATA

THIS SIDE TO BE COMPLETED BY THE CLASSIFIER

## A. KEY DATA

|                             |                                       |                    |                |                    |                  |
|-----------------------------|---------------------------------------|--------------------|----------------|--------------------|------------------|
| 1. INCTION (1)<br>A/C/D/I/R | 2. DEPT. CD./AGCY-BUR-CD. (4)<br>HU83 | 3. SON (4)<br>4400 | 4. MR. No. (6) | 5. GRADE (2)<br>13 | 6. IP NUMBER (8) |
|-----------------------------|---------------------------------------|--------------------|----------------|--------------------|------------------|

## B. MASTER RECORD

|  |   |   |  |  |   |                    |
|--|---|---|--|--|---|--------------------|
| 1. PAY PLAN (2)<br>GS                                  | 2. OCC. SER. (4)<br>360   | 3. OCC. FUNC. CD (2)                                | 4. OFF. TITLE CD (6)   | 5. OFF. TITLE (38)<br>Equal Opportunity Specialist |   |                    |
| 6. HQ. FLD. CD (1)<br>1 = HQ<br>2 = FLD<br>2           | 7. SUP. CD. (1)<br>1 = Sup. SGEG<br>3 = Mgr. SGEG<br>4 = Sup. CSRA<br>8 | 5 = Mgmt. CSRA<br>6 = Leader LGEG<br>8 = All Others | 8. CLASS. STD. CD. (1)<br>X = New Std. Applied<br>Blank = NA | 9. INTERDIS. CD (1)<br>N = No<br>Y = Interdis.     | 10. DATE CLASS (mm/dd/yyyy)<br>06/16/2004 |                    |
| 11. EARLY RET. CD. (1)<br>1 = Primary<br>2 = Secondary |   | 3 = Foreign Svc.<br>Blank = NA                      | 12. INACT/ACT (1)<br>1 = Inactive<br>A = Active              | 13. DATE ABOL (mm/dd/yyyy)                         | 14. DATE INACT/REACT (mm/dd/yyyy)         | 15. AGCY. USE (10) |
| 16. INTERDIS. SER. (40)                                |   |   |  |  |   |                    |
| (4)  | (4)   | (4)   | (4)  | (4)  | (4)                                       | (4)                |
| 17. INTERDIS. TITLE CD. (50)                           |   |   |  |  |   |                    |
| (5)  | (5)   | (5)   | (5)  | (5)  | (5)                                       | (5)                |

## C. INDIVIDUAL POSITION

|   |   |   |   |  |   |   |  |  |                            |   |  |                  |
|---|---|---|---|--|---|---|--|--|----------------------------|---|--|------------------|
| 1. FLSA CD. (1)<br>E = Exempt<br>N = Nonexempt<br>E   | 2. FIN. DIS. REQ. (2)<br>0 = None<br>1 = CD219<br>2 = CD220 | 3 = SF278<br>4 = AD392<br>5 = SF849             | 3. POS. SCHED. (1)<br>A = Sched A<br>B = Sched B<br>C = Sched C | O = Excepted but not A, B, C   | 4. POS. SENS (3)<br>IN<br>0 = Nonsensitive<br>1 = Noncritical<br>2 = Critical Sensitive | 5. COMP. LVL. (4)<br>9999   |  |  |                            |   |  |                  |
| 6. WK. TITLE CD. (4)  |   | 7. WK. TITLE (38)                               |   |  |   |   |  |  |                            |   |  |                  |
| *ORG. STR. CD. (18) (example *83 - 07 - 01 - 0200 - 08 - 19 - 00 - 00*)<br>.st    2nd    3rd    4th    5th    6th    7th    8th |   |   |   | 9. VAC. REV. CD. (1)<br>0 = Position Action<br>No Vacancy<br>A = No Change |   |   | B = Lower Grade<br>C = Higher Grade<br>D = Different title and/or Series<br>E = New Position/New FTE |  |                            |   |  |                  |
| 10. TARGET GC. (2)  | 11. LANG. REQ. (2)  | 12. PROJ. DTY IND. (1)<br>Blank = NA<br>Y = Yes | 13. DUTY STATION (9)<br>State (2)    City (4)    County (3)     |  | 14. BUS. CD. (4)  | 15. DATE LAST AUDIT. (mm/dd/yyyy)   | 16. PAS. IND. (1)<br>Blank = NA<br>1 = PAS   | 17. DATE EST. (mm/dd/yyyy)<br>06/16/2004 |                            |   |  |                  |
| 18. GD. BASIS. IND. (1)<br>1 = Rev. when vacant<br>2 = Impact of Person<br>3 = Sup/SGEG   |   |   |   | 4 = Sup./Program<br>5 = RGEG<br>6 = Policy Analysis GEG                    |   | 7 = Equipment Development Guide<br>8 = Agency Use<br>9 = Agency Use ALPHAS = Agency Use |  | 19. DATE REQ. REC. (mm/dd/yyyy)          | 20. NTE. DATE (mm/dd/yyyy) | 21. POS. ST. BUD (1)<br>Y = Perm<br>N = Other |  |                  |
| 22. MAINT. REV./CLASS. ACT. CD. (2) (1st Digit = Activity and 2nd Digit = Results)  |   |   |   |  |   |   |  |  |                            |   |  |                  |
| Normal Act  |   |   | Maintenance Review Act  |  |   | Results   |  |  |                            |   |  |                  |
| 3   |   | 1 = Desk Audit                                  | 5 = Desk Audit  |  | 1 = No Action Req.  |   | 5 = Series Change  |  | 9 = Other                  |   |  |                  |
|   |   | 2 = Sup. Audit                                  | 6 = Sup. Audit  |  | 2 = Minor PD Change   |   | 6 = Pos. Upgrade   |  |                            |   |  |                  |
|   |   | 3 = Paper Rev.                                  | 7 = Paper Rev.  |  | 3 = New PD Req.   |   | 7 = Pos. Downgrade   |  |                            |   |  |                  |
|   |   | 4 = PME/Activity Rev.                           | 8 = Panel Rev.  |  | 4 = Title Change  |   | 8 = New Pos.   |  |                            |   |  |                  |
| 23. DATE EMP. ASGN. (mm/dd/yyyy)  |   | 24. DATE ABOL. (mm/dd/yyyy)                     |   | 25. INACT/ACT (1)<br>1 = Inact.<br>2 = Act.                                |   | 26. DATE INACT/ACT (mm/dd/yyyy)   |  | 27. ACCTG. STAT. (4)                     |                            | 28. INT. ASGN. SER. (4)                       |  | 29. AGCY USE (8) |
| 30. CLASSIFIER'S SIGNATURE  |   |   |   |  |   |   |  |  |                            | 31. DATE (mm/dd/yyyy)                         |  |                  |
| 32. REMARKS   |   |   |   |  |   |   |  |  |                            |   |  |                  |

**Systemic Investigations Office  
Equal Opportunity Specialist  
GS-360-13**

**INTRODUCTION**

This position is located in the Office of Fair Housing and Equal Opportunity (FHEO), General Deputy Assistant Secretary, Office of the Deputy Assistant Secretary for Enforcement and Programs, Systemic Investigations Office. The position will be located in Headquarters and the Field, (2) Equal Opportunity Specialists, GS-360-13 will be located in Headquarters and (4) Equal Opportunity Specialists, GS-360-13 will be located in Fort Worth. The Systemic Investigations Office is responsible for identifying, coordinating, conciliating and otherwise managing the investigation of systemic complaints, Secretary-initiated investigations, complaints involving novel and/or complex issues and high profile complaints. The Systemic Investigations Office will also be responsible for the initiation of compliance reviews for recipients of federal financial assistance.

Issues include design and construction of multifamily housing, reasonable modifications, mortgage lending, homeowners' insurance, and zoning and land use. The issues raised in these complaints often are novel or complex and raise legal and policy issues of national importance. The results of these investigations are likely to establish legal precedents that have national implications which will further Fair Housing goals consistent with the Department's national priorities.

**APPLICABLE LAWS/REGULATIONS**

Applicable laws and implementing regulations include Title VIII of the Civil Rights Act of 1968, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act, Section 109 of the Housing and Community Development Act of 1974 and E.O. 11063.

**MAJOR DUTIES AND RESPONSIBILITIES**

Provides support to the Office in formulating and implementing policies and procedures regarding Systemic and Secretary-initiated cases, which may involve both program compliance and enforcement issues. These cases are some of the most complex, controversial, and sensitive fair housing civil rights cases the Department processes.

Assists in the review of cases from Regional Offices for possible systemic implications. Ensures that systemic problems identified in one location are pursued in other locations.

Keeps superiors informed by means of oral and written reports, and analyses of the status of the activities in assigned areas and the actions taken or proposed to resolve operating problems and improve management.

Provides support to the Office in developing guidance for Headquarters and FHEO Field Office staff in analyzing systemic investigative processes and preparing determinations.

Provides support to the Office in developing standards, regulations, rules, guidelines, and handbooks for the administration of Title VIII of the Civil Rights Act of 1968, as amended, which prohibits discrimination in most of the nation's housing, public and private, and which is directly administered and enforced by HUD. These issuances are effective nationwide and are applicable to all dwellings within the purview of the Fair Housing Act.

Assists in the conduct of special and complex on-site evaluations and reviews performance activities of enforcement staff to determine if enforcement activities are in accordance with national policy, directives, rules and regulations and assists in the preparation of reports relating to such activities making recommendations to remedy deficiencies or to achieve greater efficiency in the program.

Assists in responding to all systemic case-related correspondence, as well as sensitive and critical correspondence concerning statutory responsibilities, including Congressional inquiries, and requests for reviews of determinations.

Provides support in the drafting of policy positions having national impact in relation to systemic cases, or in relation to the elimination of housing discrimination and directs responses to Congressional inquiries defining HUD policy with respect to the assigned responsibilities of the Office.

Requests, receives and critiques reports from the field; informs and makes recommendations regarding all aspects of program operations at all management levels.

Provides support to the Office in developing the Systemic Office's component of the Management Plan, Budget and other management instruments.

Assists in preparing formal comments, or otherwise makes substantive recommendations with respect to proposed legislation, regulations, guidance or policy affecting HUD's fair housing and equal opportunity programs and obligations.

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

A thorough knowledge of the principles and concepts in the field of equal opportunity including a thorough knowledge of relevant laws, legal principles, and history in the field and broad knowledge of the legal and administrative processes, by which equal opportunity laws are implemented

A working knowledge of the trends in FHEO programs, and the management and utilization of up-to-date information within the field in order to provide FHEO staff with information upon which to develop solutions to significant problems of potentially broad impact.

Comprehensive knowledge of compliance practices, procedures, and techniques and management requirements of the programs is required.

Demonstrated skill in fact finding, analysis, problem solving, writing, and consulting to identify problems and recommend solutions within assigned organizational components.

### **Factor 2. Supervisory Controls**

Work is done under the supervision of the Director, who provides guidance as to major Departmental objectives, priorities and policies, and who is available for consultation. The employee exercises independent judgment in planning and carrying out assigned duties, which involves selecting the appropriate techniques. The Director will address matters concerning substantive questions. The Director relies on the working level of expertise of the incumbent in assuring that overall goals and objectives are met.

The work is reviewed in terms of overall accomplishments, meeting of critical deadlines and deliverables and compliance with Departmental laws and regulations.

### **Factor 3. Guidelines**

Guidelines include Departmental Handbooks, Notices, administrative and court precedent decisions and policy statements. Guidelines are subject to continuous interpretation and revision as the result of court decisions, new legislation and administrative practices.

The incumbent uses sound judgment in adapting policies to solve problems associated with evidence of systemic discrimination in housing or the effects of past discrimination. Equal Opportunity Specialists will be required to develop plans for compliance reviews of housing recipients that will focus on discrimination issues within the intent of the laws, regulations and established precedents.

### **Factor 4. Complexity**

The work involves assisting in conducting investigations, compliance reviews and analyses of relatively complex FHEO problems and issues, and identifying operational and programmatic deficiencies.

Assignments are difficult because of their broad scope, complexity (novel and complex cases, which include design and construction, discriminatory financing, steering, reasonable accommodation/modification, discriminatory brokerage services), the number of possible approaches and the need to decide on an approach that will produce the best results. The work requires the development of recommendations to change management policies and practices to improve compliance results in the assigned organization.

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

The purpose of the work is to assist in managing a comprehensive National effort to maximize all programs and resources, which can be directed toward ending discrimination in housing. Work product has a major impact on the policies, practices and the operational effectiveness of the assigned organization components.

**Factor 6. Personal Contacts**

Personal contacts are with top-level officials of state and local government, other federal agencies, managers, staff officials, Departmental attorneys, and staff representatives of the housing industry. These contacts are usually of a non-routine nature.

**Factor 7. Purpose of Contacts**

The purpose of the contacts is to identify and discuss issues or programs relative to fair housing enforcement, and identify possible solutions. Another purpose is to obtain essential information from those individuals.

**Factor 8. Physical Demands**

The work is usually sedentary and involves sitting comfortably to accomplish most tasks. No special physical demands are required.

**Factor 9. Work Environment**

The work involves normal risks associated with working in an adequately lighted and ventilated office. Travel is required.

**POSITION CLASSIFICATION  
EVALUATION STATEMENT**

**Position Title, Series and Grade:** Equal Opportunity Specialist, GS-360-13

**Organizational Location:** Department of Housing and Urban Development  
Office of Fair Housing and Equal Opportunity (FHEO)  
Office of the Deputy Assistant Secretary for Enforcement  
and Programs  
Systemic Investigation Office

**Reference:** OPM PCS, Equal Opportunity Compliance Series, TS-49,  
GS-360, dated November 1980

**Background:**

The Systemic Investigation Office is responsible for identifying, coordinating, conciliation and managing investigations of systemic complaints, Secretary-initiated investigations, complaints involving novel and/or complex issues and high profile complaints. In addition, this office has the responsibility for initiating compliance reviews for recipients of Federal financial assistance.

**Title and Series Determination:**

The incumbent supports the mission and function of the office in formulating and implementing policies and procedures regarding systemic and Secretary-initiated cases. These cases involve program compliance and enforcement issues and are highly complex, controversial, sensitive and extremely important cases processed by the Department. Incumbent assists in the review of cases for possible systemic implications.

The Equal Opportunity Compliance Series includes positions that perform such work as fact-finding, analysis, writing, and applying civil rights or equal opportunity principles to identify and/or solve problems. Positions may also be involved in investigating and conciliating allegations of discrimination; identifying systemic or institutional barriers to equal opportunity; reviewing, evaluating, and enforcing equal opportunity compliance by Government contractors and other recipients of public funds; proposing or implementing solutions to problems when the work involves a high degree of analysis; or performing similar work requiring equivalent qualifications.

The title, which denotes an immediate understanding and identification of the job and the series, is Equal Opportunity Specialist, GS-0360.

**Grade Determination:**

The grade level of this position is evaluated by application of the nine factors in the standard.

**Factor 1. Knowledge Required by the Position**

**Level 1-7, 1250 pts.**

The incumbent possesses a thorough knowledge of the principles and concepts in the field of equal opportunity including relevant laws, legal principles and history in the field. Applicable laws and regulations include Title VIII of the Civil Rights Act of 1968, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act, Section 109 of the Housing and Community Development Act of 1974 and E. O. 11063.

FL 1-7 is comparable to the knowledge described in the position, which lists a comprehensive and thorough knowledge of laws, regulations, Executive Orders, court decisions and issues related to an equal opportunity program.

**Factor 2. Supervisory Controls**

**Level 2-4, 450 pts.**

The Division Director establishes the overall major Departmental objectives, priorities, and policies, and in conjunction with the employee, deadlines are established. Assignments are carried out independently; however, the supervisor is available to answer questions in unusual or controversial areas. The employee uses independent judgment in planning and executing assignments.

The supervisory controls described are comparable to FL 2-4 in that at this level, the supervisor sets the overall objectives. The supervisor and the employee develop deadlines and establish approaches to problems. The employee exercises independent judgment in planning and carrying out assignments.

FL 2-4 is assigned.

**Factor 3. Guidelines**

**Level 3-4, 450 pts.**

Guidelines are available, i.e., Executive Orders, Department Handbooks, Notices, court precedent decisions, policy statements. Many of these guidelines require extensive interpretation to apply to the situation at hand. Incumbent is resourceful in defining and interpreting guides.

Factor Level 3-4 is applicable to the guidelines described. At this level, guidelines are available but may be broadly stated and require the employee to be resourceful in redefining the guides.

**Factor 4. Complexity**

**Level 4-5, 325 pts.**

The work involves conducting investigations and compliance reviews of complex fair housing equal opportunity problems and issues, i.e., Secretary-initiated cases that may involve both program compliance and enforcement issues. These cases are some of the most complex, controversial, and sensitive fair housing civil rights cases that the Department processes. Issues that make these cases complex may include such things as design and construction, discriminatory financing, steering, reasonable accommodation, modification, discriminatory brokerage services, etc.



FL 4-5 is assigned because, at this level, the complexity equates to work carried out by specialists who individually perform complete assignments, which include factfinding and analytical techniques that require decisions in interpreting varied and complex situations.

**Factor 5. Scope and Effect**

**Level 5-6, 450 pts.**

The incumbent reviews cases for systemic implications. He/She provides support to the Office by developing standards, regulations, rules, guidelines, and handbooks for the administration of Title VIII of the Civil Rights Act of 1968, as amended, which prohibits discrimination in most of the nation's housing, public and private, and which is directly administered and enforced by HUD. These issuances are effective nationwide and are applicable to all dwellings within the purview of the Fair Housing Act.

The work provided by the incumbent helps to manage a nationwide effort toward ending discrimination in housing. Final work products have a major impact on policies, procedures, practices and operations of HUD programs.

FL 5-6 is assigned. At this level, the purpose of the work is to plan and conduct critical projects that are vital to the equal opportunity mission of the agency. The work results in improved opportunity for employment, housing, or other services for persons who otherwise would not have an equal opportunity.

**Factor 6. Personal Contacts**

**Level 6-4, 110 pts.**

Personal contacts are with high-level officials in HUD, Department of Justice, Department of Agriculture, Veterans Administration, Small Business Administration, and other Departments and agencies with housing programs. Contacts at this level are for a variety of reasons, such as, assuring uniform and effective enforcement of laws and policy, and negotiating and/or defending major controversial issues, etc. FL 6-4 is assigned.

**Factor 7. Purpose of Contacts**

**Level 7-3, 120 pts.**

The purpose of the contact is to establish and discuss information and issues of the program and identify and negotiate possible solutions

FL 7-3 is assigned. At this level, the purpose is to negotiate on procedural points, to conduct formal interviews with persons who have information essential to a compliance case, or to persuade individuals.

**Factor 8. Physical Demands**

**Level 8-1, 5 pts.**

Work is performed in an office setting with no special physical demands.

**Factor 9. Work Environment**

**Level 9-1, 5 pts.**

Work is performed in a office with no special risks taken to perform the work.

Total Points = 3165

**Final Determination:** The total point score for all factors is 3165. Based on the Grade Conversion Table, a range of 3155 - 3600 points equate to GS-13. This position is correctly classified as an Equal Opportunity Specialist, GS-360-13.