

## Position Designation Questionnaire (PDQ) Frequently Asked Questions

Additional information and assistance in completing the PDQ may be found by contacting your [servicing HR Specialist](#) or on [OPM's website](#)

### **1. Does a supervisor require the same or higher level of investigation as a subordinate employee?**

For questions on both Section 1 and Section 2 of the form, if an employee has duties that require a an investigation level above the minimum screening level (a NACI), positions in the supervisory chain of command will likely have the same or higher level of clearance than subordinate employees. For example, if a chemist working in a lab has controlling access of chemical waste in the lab requiring a public trust clearance, his or her supervisor will also need a public trust clearance. Note however, there are some positions at USGS requiring a public trust or National Security Clearance due to specific project work such as reimbursable work with DOE, NASA, etc, for which the supervisor does not require access to the public trust or National Security materials and for which the supervisor does not require the same or higher level of investigation.

### **2. What is meant by hazardous materials under Section 1 of the PDQ?**

Under Section 1, National Security, hazardous material refers to biological select agents, nuclear and chemical weapons, and similar materials. OPM's definition includes the ability to independently compromise or exploit

- biological select agents
- toxins, chemical agents,
- nuclear materials, or
- other hazardous materials

If a material is not listed in Section 1, it may be addressed under Section 2, Public Trust. (see question 8 below)

NOTE: Potential for damage from misuse of this authority is addressed at the end of section 1 of the PDQ.

### **3. What is meant by protecting or controlling access to restricted facilities or IT systems? Does this include duties such as setting up DOI access cards, facility access cards, issuing property passes, ensuring files are archived for IT, etc..?**

No, under Section 1 of the PDQ (National Security) controlling access refers to things like border control, ports, critical infrastructure. For IT systems security, this question refers to physical access to critical systems (routers, servers...). Controlling access is addressed again under section 2 of the PDQ (Public Trust) and some of these type duties will fall under this.

**4. Do positions that investigate issues related to national security, suitability determinations, or identity credentialing require a National Security Designation? Does this include people who issue DOI Access (PIV) cards at Centers and Field Stations?**

Positions that conduct investigations of national security positions within the Security Office or adjudicate positions for Employee Relations would answer yes to this question. Because the investigation, systems access, etc., required to issue credentials is strictly controlled by the Security Office processes, employees who hand out PIV cards at employment sites do not require higher level clearance. If duties are limited to handing out cards issued by the security office, the answer should be no to this question.

**5. What types of public health programs/duties are addressed under National Security (Section 1 of the PDQ) ?**

Pandemic disease control, urgent health threats (Zika, Ebola...), threats to the national transportation system. OPM describes positions answering yes to this question as having potential for “significant to inestimable damage” to National Security.

**6. What is considered a major program responsibility under Section 2, Public Trust criteria?**

This will vary depending on the type of position/position location/organizational level of the position. For many Science Centers, it is likely that only the Center Director position would have “major program” responsibility, Because the Center Director reviews and signs off on program level decisions, the program level authority is vested in that one position. Directors of Headquarters-level functions (Administration, Finance...) would also likely fall into this category. In answering the question, consider whether the position has authority to act independently to bind the government to significant decisions, such as signing high value agreements with cooperators or issuing policy statements that affect all of USGS or have significant impact on the public. If the position does not act independently in matters that bind the government in significant ways, the answer should be no to this question.

**7. What is meant by protection of environmental safety in Section 2?**

OPM’s guidance covers such issues as food inspection, environment hazard mitigation, and transportation safety enforcement. The guidance covers three levels of impact for protection of the environment. If you answer yes to the question, when you get to the bottom of the form consider these levels of impact

- Severe: Immediate, significant, and independent responsibility for protecting the public’s health and safety in areas outside of national security, such as: Food safety and inspection; Occupational health and safety; Transportation safety enforcement; Environmental safety; Environmental hazard mitigation
- Moderate: Position is actively, operationally engaged in services related to the duties in this category (but has only moderate ability to impact the public’s trust), such as: Performing inspections; Enforcing established standards; Providing regulatory advice and direction

- Limited: The position aids or supports the duties in this category; however, the responsibilities are so narrow in scope or carried out under such restrictive controls that the risk of violating the public's trust is very limited

NOTE: Many Center positions will likely fall under moderate or limited impact because there is neither the enforcement/inspection piece involved nor the "immediate, significant, and independent" decision making involved; there are, however, some USGS positions that will have potential for "severe" impact.

### **8. What would be considered "hazardous materials" from a Section 2, Public Trust perspective?**

Duties related to hazardous materials include: hazardous material handling and transportation (such as medical waste, mechanical or industrial waste, (i.e. waste chemicals, fuel, oil, batteries, etc.) This could include biological pathogens not considered as biological select agents under National Security duties.

### **8. Does procures services of less than \$2 million apply to all government purchase and travel card holders?**

No. Purchase and travel credit cards are issued in the employee's name; the ability to impact the government is strictly controlled by card limits and system controls. This applies more to contracting and grants duties, for example a warranted contracting officer would be covered by these provisions as well as some administrative and financial positions with authority to approve financial or contract agreements, even if final signatory authority is at a higher level in the organization.

### **9. Does physical security under Section 2, Public Trust include individuals issuing security badges to access facilities?**

Those issuing non-PIV access (cards, badges) to secure facilities would be considered as performing Public Trust (or in some cases National Security) duties. However, since PIV cards are issued through the Security Office even when they're handed out by Center personnel, those who distribute PIV cards (but don't do the background investigation to determine whether to issue them) do not require additional investigation. Public Trust designation also applies to physical access to non-critical (with no national security implications) IT systems (access to the hardware, servers, etc. for IT systems). This does not apply to individual workstations (i.e., a desktop or laptop computer).

### **10. What is meant by "conduct (non-criminal) investigations"? Would this include administrative reviews?**

Administrative reviews would fall under OPM's definition these duties that would have limited impact. "Conducts or assists in conducting Government investigations, inquiries, or audits of a routine nature, but has very limited opportunity for independent action." For administrative reviews, the answer will generally be yes; however, when you get to the questions at the bottom of the form regarding potential impact, the answers would likely be limited potential for damage and agency

impact. However, if an administrative review includes significant funding issues/questions, it may rise to a moderate or severe impact.

**11. What about program reviews where project funding or auditing use of funds is under review?**

If the amount of funding and/or public visibility of the program is relatively high, these would likely fall under OPM's definition, "Conducts, under limited authority, internal and/or external non-criminal investigations, inquiries, or audits, the outcome or compromise of which could negatively impact the public's trust." The questions at the bottom of the form could mitigate the potential impact of the work, depending on the scope of the project and the level of review the work is subject to.

**12. Should the answer be yes to the public liaison duties for all scientific and technical personnel who have any public contact? What about office administrative personnel who answer phones?**

For most positions with contact with general public, the answer should be yes to the public liaison question. Some positions have such limited contact that it's not necessary to answer yes. For example, an administrative clerk who answers the phone for the purpose of directing calls would be a no, but a receptionist at a public office who answers general information questions regarding USGS functions would be yes. Again, mitigating circumstances are addressed by the questions at the end of the form; if contacts don't include making significant decisions that would bind the government (e.g., negotiating a contract with a cooperator with the authority to sign off) or have potential for severe harm to the integrity of the service, it will likely not require higher level clearance. So a scientist who negotiates with other agencies or cooperators for terms and conditions of an agreement has a different public contact impact than a hydro tech who requests access to set up a stream gage. Note that the questions at the end of the form refer not just to supervisory controls but also programmatic controls. A Scientist that independently plans and conducts outreach activities with little input from the supervisor but does so in a narrow program area with little potential for impact or harm would still be considered to be operating under close technical supervision.