



## Department of Energy

Office of Science  
Brookhaven Site Office  
P.O. Box 5000  
Upton, New York 11973

Dr. JoAnne Hewett  
Brookhaven Science Associates, LLC  
Brookhaven National Laboratory  
Upton, New York 11973  
*Sent via email only*

Dear Dr. Hewett,

**SUBJECT: OFFICE OF SCIENCE USAGE OF THE OFFICE OF PERSONNEL MANAGEMENT, POSITION DESIGNATION TOOL FOR CONTRACTOR BACKGROUND INVESTIGATIONS**

In January 2025, the Office of Personnel Management (OPM) published a revision to 5 Code of Federal Regulations Part 731, *Suitability and Fitness*, and included a final rule that contractor employees' fitness for duty be subject to the same position designation requirements and investigative standards as federal employees. Specifically, §731.106 mandates that the request for background investigations (BI) includes the use of a system to designate a position's risk level (i.e., low, moderate, and high) based upon duties, responsibilities, and the potential for a person to adversely impact the organization. This designated risk level determines the commensurate level of BI to be conducted. For this purpose, OPM has established the [Position Designation Tool \(PDT\)](#) as the official risk designation system to be used.

The purpose of this memorandum is to provide notification that the Office of Science (SC) is implementing the use of the PDT for all elements under its cognizance. As a result, laboratories must use the OPM PDT to initiate BIs for laboratory employees who require a security clearance. Similarly, use of the PDT is also required for uncleared laboratory employees (employees not requiring a clearance) and certain uncleared contractors at SC laboratories who require an uncleared Homeland Security Presidential Directive 12 (HSPD-12) credential/badge.

Because there are five types of BIs, it is critical our labs request the correct investigation for each contractor based on the duties and risk level of their position. Once a PDT assessment is completed by the SC laboratory, an official Position Designation Record is generated and provided to the SC Cognizant Personnel Security Office along with other required documentation to complete the request for a BI.

Currently, 5 CFR Part 731 is not referenced in Order 472.2A, *Personnel Security*. Until Order 472.2A is revised to include this reference and specify the PDT as the required system to be used for this purpose, this memorandum is being provided as official guidance for SC laboratories to utilize the PDT when initiating future BIs for laboratory personnel and subcontractors. Laboratories, within 60 days of receipt of this memorandum, should be fully utilizing this system for all investigation requests.

If there are any questions or additional information required, please contact Angela Harvey, Supervisory Personnel Security Specialist, Office of Safety and Security, at [angela.harvey@science.doe.gov](mailto:angela.harvey@science.doe.gov) or 865-576-0925.

Sincerely,

Romayne Howard-McKellar  
Contracting Officer  
BHSO Business Division

cc: C. Ferguson, SC-BHSO  
G. Olson, SC-BHSO  
S. Alexander, SC-BHSO  
J. Loh, SC-BHSO  
A. Emrick, BSA  
A. Troutman, BSA  
M. Venegoni BSA