

# **Exhibit 1.7: Guidance for Professionally Qualified Staff (PQS) Applications**

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## **TABLE OF CONTENTS**

<b>INTRODUCTION .....</b>	<b>1</b>
<b>ARCHITECTURAL HISTORY.....</b>	<b>2</b>
<b>ARCHAEOLOGY .....</b>	<b>2</b>
<b>APPLICATION PROCESS .....</b>	<b>3</b>
<b>APPLICATION CONTENT.....</b>	<b>3</b>
<b>EDUCATION .....</b>	<b>4</b>
Upper Division Coursework.....	4
Supervised Field Training (Archaeological Crew Member Only) .....	4
College Degree.....	4
<b>RESEARCH, RESOURCE-SPECIFIC STUDIES, AND REPORTING .....</b>	<b>5</b>
<b>PROFESSIONAL EXPERIENCE .....</b>	<b>6</b>
Research, Writing, Teaching, and Interpretation (Architectural History) .....	7
Field Experience (Archaeology).....	7
Laboratory Experience (Archaeology) .....	8
<b>SECTION 106 AND PRC 5024 EXPERIENCE .....</b>	<b>9</b>
<b>FAMILIARITY WITH CALTRANS POLICY, PROCEDURES, AND CONTRACTING .....</b>	<b>9</b>
<b>PQS ADVANCEMENT .....</b>	<b>10</b>
<b>DISPUTE RESOLUTION .....</b>	<b>11</b>
<b>PQS DEMOTION AND REINSTATEMENT.....</b>	<b>11</b>
<b>PQS STATUS.....</b>	<b>11</b>

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## Introduction

All cultural resource studies carried out by Caltrans or its consultants must be conducted by, or under the direct supervision of, individuals who meet the Secretary of the Interior's Professional Qualifications Standards for the relevant field of study. Under the Section 106 Programmatic Agreement (106 PA)<sup>1</sup> and the Public Resource Code (PRC) 5024 Memorandum of Understanding (5024 MOU)<sup>2</sup>, Caltrans cultural resource staff demonstrate these standards by being certified as Professionally Qualified Staff (PQS). This exhibit was developed to assist Caltrans staff in attaining PQS certification.

There are eight PQS designations with three cultural specialist orientations under the 106 PA/5024 MOU. Caltrans staff may be certified under more than one specialist orientation, if qualified.

- Archaeological Crew Member
- Lead Archaeological Surveyor
- Co-Principal Investigator—Prehistoric Archaeology
- Co-Principal Investigator—Historical Archaeology
- Principal Investigator—Prehistoric Archaeology
- Principal Investigator—Historical Archaeology
- Architectural Historian
- Principal Architectural Historian

The categories of PQS within each specialist orientation have specific requirements and are tiered to capture increasing levels of professional experience and education. These tiers reflect the level of responsibility necessary when documenting cultural resources at Caltrans. See Exhibit 1.6 – Required Expertise for Cultural Resource Actions – for the levels

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<sup>1</sup> First Amended Programmatic Agreement Among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and the California Department of Transportation Regarding Compliance with Section 106 of the National Historic Preservation Act as it Pertains to the Administration of the Federal-Aid Highway Program in California, effective January 1, 2014.

<sup>2</sup> 2015 Memorandum of Understanding between the California Department of Transportation and the California State Historic Preservation Officer Regarding Compliance with Public Resources Code Section 5024 and Governor's Executive Order W-26-92, addended 2019.

of professional experience required to conduct tasks and roles within a discipline under the 106 PA/5024 MOU.

Prior to applying for PQS certification, all Caltrans cultural staff, regardless of work experience or academic background, are required to attend an intensive training class on use of the 106 PA/5024 MOU. The Cultural Studies Office (CSO) typically offers these trainings annually. Additionally, it is recommended that staff have six months of experience in a Caltrans cultural position prior to applying for PQS to gain the appropriate understanding of the Department's policies and procedures. Only Caltrans staff can be certified as PQS. While consultants must meet the PQS-equivalent level relevant to the studies being conducted, CSO does not review their qualifications, nor should consultants submit PQS applications. Consultant qualifications are reviewed by district staff with whom they work.

### **Architectural History**

There are two PQS tiers for specialists working in architectural history: Architectural Historian (AH) and Principal Architectural Historian (PAH). Regardless of prior professional experience, a college degree in architectural history or a closely related field with a concentration in American architecture or history is required for both tiers.

### **Archaeology**

There are four PQS tiers for specialists working in archaeology. The first two— Archaeological Crew Member and Lead Archaeological Surveyor— do not distinguish between where the applicant gained experience or a specialist orientation. The second two— Co-Principal Investigator (Co-PI) and Principal Investigator (PI)— include separate designations for specialization in prehistoric or historical archaeology. Professional experience in California or the Great Basin is required to qualify for Co-PI or PI in prehistoric archaeology. Experience in California or the Great Basin is preferred for Co-PIs and PIs in historical archaeology; however, experience in the western portions of the United States, Mexico, and Canada can also satisfy the PQS requirements because of the similarities in context and material culture. In the PQS application, staff should justify any qualifying experience outside of California. Education and experience in maritime or underwater archaeology focusing on prehistoric or historic-era cultural resources are also applicable to PQS requirements in their respective specializations.

The following sections provide guidance on the PQS application process, content, and requirements; suggest ways to advance to higher PQS levels within a discipline; and offer steps for resolving disagreements about an individual's PQS status. Contact CSO for further clarification or to discuss professional experience that falls outside of the outlined requirements as described below.

## **Application Process**

Caltrans staff initiate PQS certification by submitting a completed application to CSO. The forms must be signed by both the PQS applicant and their supervisor. By signing their staff's application, the supervisor is acknowledging that they have reviewed the forms and found the experience levels appropriate. Hard copies and electronic submittals are both acceptable methods of submission. See the Application Content section below for PQS application links and further details.

The CSO reviewer will email an acknowledgement of receipt to the applicant. The reviewer may request additional information or clarification during the review process. If the applicant does not appear to meet the PQS standards for certification, the reviewer will notify the applicant and specify the additional experience needed. If the application is approved, it will be acknowledged with a signed letter from the CSO Chief. While awaiting PQS certification, Caltrans staff may perform tasks under the 106 PA/5024 MOU under the direct supervision of Caltrans PQS in the appropriate discipline.

## **Application Content**

Qualification for each PQS designation requires different combinations of education, proficiency in research and reporting, professional experience, Section 106 and PRC 5024 experience, and Caltrans-specific experience. These qualifications are demonstrated through the completion of college course work and degrees, training, field and laboratory work, and report writing. Attachment 1 of the 106 PA/5024 MOU contains the specific requirements for each PQS designation. Applicants document these requirements on the appropriate PQS Qualifications Certification forms, available on the Caltrans Division of Environmental Analysis [PQS webpage](#).

The application package will consist of the PQS Qualifications Certification Form for the relevant PQS designation(s), a current resume or CV, and any supporting documentation necessary to supplement the review. The need for supplemental documentation will vary

based on the level of PQS being applied for and the nature of previous education and experience. Supplemental documentation may include a copy of college transcripts, examples of professional writing, or examples of proficiency in advanced cultural resource procedures or concepts. Large documents should be provided electronically.

The following sections provide a list of the requirements needed to qualify under any PQS designation, as well as guidelines for reporting them correctly on the relevant PQS Qualifications Certification Form. Applicants should reference this section and Attachment 1 while completing the forms to ensure they are providing the appropriate information to document their fulfillment of each requirement.

## **Education**

Qualification for most PQS designations requires at least a bachelor's degree in a relevant field of study. Upper division coursework and major research reports completed in the course of attaining this degree can also be used to demonstrate fulfillment of additional non-professional PQS requirements, such as proficiency in the identification and evaluation of architectural or archaeological properties.

### ***Upper Division Coursework***

- Upper division coursework should focus on advanced concepts of method and theory in the relevant PQS specialist orientation.
- If course titles are ambiguous, provide explanatory details on how they satisfy PQS requirements.

### ***Supervised Field Training (Archaeological Crew Member Only)***

- Qualification for the Archaeological Crew Member designation requires six weeks of supervised field training. This experience should be equivalent to a field school or internship in an academic setting. If using professional experience to satisfy this requirement, provide additional information to demonstrate the training received in survey and excavation techniques.
- Supervised field training must be conducted in time blocks of at least one week.
- If using a field school or internship to satisfy the supervised field training requirement, the same course(s) should not be used to satisfy the upper division coursework requirement.

### ***College Degree***

- Attachment 1 provides the specific college degrees that can be used to satisfy the requirements of each PQS designation.

- As noted in Attachment 1, applicants can also use a degree in a “closely related field” to that of the relevant PQS specialty. CSO will evaluate closely related degrees on a case-by-case basis for applicability. In all cases, applicants must also include upper division coursework specific to the PQS specialty being applied to.
- Theses, dissertations, or comparable major studies completed in pursuit of college degrees can be used to fulfill different requirements for most PQS designations; however, these reports should not be used to fulfill requirements relating to professional experience.

### **Research, Resource-Specific Studies, and Reporting**

Qualification for most PQS designations requires a demonstrated proficiency in one or more of the following: the ability to identify and formally evaluate built-environment or archaeological properties, familiarity with architectural and archaeological research methods, and the ability to carry advanced research to completion. Applicants can demonstrate these proficiencies through the completion of appropriate reports.

Reports that fulfill the above requirements do not have to be completed in a professional setting. Major reports such as theses, dissertations, or comparable major studies written while in the course of attaining a college degree are usually appropriate. In many cases, a single report can satisfy more than one of these PQS requirements. Reports can also be combined with the appropriate upper division coursework to fulfill these requirements.

Regardless of the type of report, the applicant should be a primary or secondary author and have directly participated in a leading role for the relevant proficiency. Applicants should be sure to include the role in the tasks being reporting when citing authorship in the PQS Qualification Certification Forms. Include only reports that are directly related to the relevant proficiency and specialist orientation- inventory reports generally don't show proficiency in advanced research methods, and excavation reports concerning prehistoric archaeological sites don't show experience in evaluating historic-era resources.

- Major research reports or publications used to demonstrate the ability to carry research to completion should be comparable in scale and scope to a master's thesis and be primarily based on original research.
- Survey reports should include positive results to show experience in resource recording.
- Survey, Extended Phase I, and construction monitoring reports generally do not include elements that demonstrate the ability to conduct research or evaluation for archaeological PQS designations.

## **Professional Experience**

In addition to the proficiencies discussed above, most PQS designations also require minimum amounts of professional experience in their field. Architectural historians demonstrate their professional experience through research, writing, teaching, interpretation, or similar professional activities. Archaeologists demonstrate this experience through fieldwork, laboratory work, and professional report writing focused on the relevant specialty. Archaeological PQS designations further require this experience to include specific types of field and laboratory experience. Qualifying professional experience for any PQS designation can be paid or volunteer, but generally does not include coursework or fieldwork done in pursuit of achieving a college degree.

Experience outside of California or the Great Basin may be applicable in some circumstances; however, its use to satisfy PQS requirements should be discussed with CSO and competence in regional archaeology must be demonstrated. Professional experience in historical archaeology outside of western North America, including material culture studies and museum experience, may be applicable to the PQS requirements in historical archaeology when overlapping with California's contact period and onwards.

The PQS Qualifications Certification Forms include a single block of fields to document all professional experience. The total amount of weeks or months reported in the block must equal at least the minimum amount of required professional experience. Applicants should clearly indicate on the form which (if any) specific type of requirement(s) is being satisfied by a listed project or job position (e.g. supervised excavation in California, professional research in American history) so the reviewer can easily discern that the requirements have been met. It may be necessary to list the same project multiple times in the block if it is being used to satisfy multiple requirements.

- The most common reason for rejected applications is a lack of specificity regarding which examples of professional experience apply to which specific PQS requirements.
- Documentation of individual projects in total weeks or months is preferred, to be comparable to additional PQS requirements. One month is equivalent to four full work weeks. One work week is equivalent to a total of five full workdays. Projects can be reported in days if they did not total full work weeks or months.
- Professional experience used to demonstrate qualifications should be focused on the relevant PQS specialty. If experience includes work on multi-component resources, estimate and report just the total time spent conducting work focused on the relevant specialty.

- Activities used to satisfy specific types of professional experience can be used toward the overall professional experience requirement for a PQS designation if it is geared toward the appropriate specialist orientation and/or geographical areas.

### ***Research, Writing, Teaching, and Interpretation (Architectural History)***

Qualification as a Principal Architectural Historian requires 24 months of experience in professional positions that can include any combination of research, writing, teaching, interpretation, or other professional activities related to the practices of architectural history.

- Clearly describe job duties and type of experience gained in the position.
- Experience should be focused on California or US History.
- If a position included work in multiple fields or specialties, estimate and report only the time spent conducting professional activities related to the practices of history or architectural history.

### ***Field Experience (Archaeology)***

The archaeological PQS designations all require a combination of professional survey and excavation experience in supervisory and supervised roles. Co-Principal Investigators and PIs also require a minimum amount of experience in California or the Great Basin. While fieldwork experience in California or Great Basin is preferred for all archaeological PQS applicants, certain field requirements can be met through work conducted outside of these regions. The applicant should be prepared to discuss the applicability of any experience outside of the regions specifically listed in Attachment 1.

Reported field experience should include time spent working as a member of a field crew on a professional field effort. Field schools taken in pursuit of a college degree do not count towards this experience; however, volunteer work in a supervisory capacity at a field school *can* be used to demonstrate professional field experience if it is not conducted for course credit towards a degree.

Principal Investigators require a minimum of one year (12 months or 52 weeks) of total field experience. Common field activities that do not count towards any specific fieldwork requirements, such as construction monitoring in a non-supervisory role or site condition assessments, can be used to fulfill this general fieldwork requirement. Projects used to demonstrate specific fieldwork requirements also count towards the total time required for general field experience.



- Excavation and Survey
  - Excavation includes Extended Phase One, Phase II, or Phase III efforts.
  - Time reported for survey or excavation efforts should only include actual days or weeks in the field.
  - Must be focused on site types relevant to the PQS specialist orientation being applied for. If work includes multiple site types or multicomponent sites, estimate days/weeks of total effort that focused on the appropriate specialty.
- Supervised fieldwork
  - Experience as a member of a field crew under a PI-equivalent field supervisor or crew chief.
  - The purpose of this requirement is to demonstrate professional field training in the practices of the specific PQS specialist orientation being applied for.
  - The supervisor should be qualified as a PI in the given specialty being applied for.
- Supervisory Fieldwork
  - Experience as crew chief, field supervisor, PI, or equivalent on field surveys and/or excavations, as appropriate.
  - Role should include responsibility for independent decision making and the direction of staff in the field.
- Reported times should only relay actual time spent in the field. The totals should not include time spent preparing equipment, report writing, or other non-field management activities on a project.
- Archaeological experience outside of California or the Great Basin may be applicable in some circumstances; however, its use to satisfy PQS requirements should be discussed with CSO and competence in regional archaeology must be demonstrated.
- Experience in historical archaeology outside of western North America may be applicable to specific PQS requirements in historical archaeology when overlapping with California's contact period and onwards; however, it must be discussed with CSO and competence in regional archaeology must be demonstrated.

### ***Laboratory Experience (Archaeology)***

Depending on the PQS level and focus, archaeologists need up to eight weeks of collections or lab experience under the supervision of a PI in the applicable specialty. Lab experience should focus on archaeological collections, including orphaned or underreported collections. In limited cases, work on non-archaeological museum collections may also be appropriate for PQS in historical archaeology; applicability of this experience must be discussed with CSO.

- Reported time should include time spent on actual laboratory work and related activities.
- The lab supervisor should qualify as a PI in the relevant specialist orientation.

### **Section 106 and PRC 5024 Experience**

An understanding of the Section 106 and PRC 5024 processes is critical to conducting project work at Caltrans. This understanding can be learned and demonstrated by attending specialized trainings, participation in a variety of compliance activities, and the preparation of cultural resource compliance reports. Applicants can use experience gained in both professional and non-professional settings, including work done outside of Caltrans, to satisfy these requirements; however, any experience included in the forms should be directly related to compliance with Section 106 or PRC 5024 processes.

The PQS levels of Co-PI/AH and above require experience in the more advanced and difficult aspects of Section 106/PRC 5024 compliance. This experience should include examples such as advanced training in the 106/5024 process, direct involvement in the evaluation of complex properties, and direct involvement in meaningful consultation with stakeholders over important cultural resources.

- Reports that demonstrate Section 106/5024 compliance include inventory and evaluation reports, finding of effect documents, construction monitoring reports, and agreement documents, among others.
- Project oversight does not typically include direct involvement in many aspects of the Section 106 and PRC 5024 process. If including oversight of consultant-prepared projects to fulfill these requirements, include additional information specifying the applicant's role in the relevant tasks of the project.
- Examples of appropriate training include Section 106 training, the 106/5024 Programmatic Agreement (PA) Training, including courses offered by Caltrans as well as other applicable organizations, such as professional societies, CRM organizations, and academic institutions.
- If trainings, projects, or reports have ambiguous titles, provide additional information to clarify how they satisfy these requirements.

### **Familiarity with Caltrans Policy, Procedures, and Contracting**

In addition to understanding the application of Section 106 and PRC 5024, qualification as a PI or PAH requires an understanding of Caltrans-specific cultural resource policies and procedures, as well as contracting and task order management. This familiarity can only be gained through work and training while employed at Caltrans. Applicants demonstrate this familiarity through the completion of training sessions, Caltrans-specific reports, and

involvement in Caltrans projects. While there is no specific time requirement to satisfy this requirement, CSO prefers at least six months employment prior to applying for PQS status.

- When citing reports or projects in the forms under these requirements, it is helpful for the applicant to include a brief description of the role played (e.g. task order manager, peer reviewer, project historian).

## **PQS Advancement**

The Cultural Studies Office encourages staff to apply for the highest PQS level possible and supports opportunities to gain professional experience in order to advance to the next PQS level. If staff choose to gain the necessary fieldwork required to advance their PQS levels through a field school, this should be discussed with CSO to ensure applicability. Outside of the first PQS level in archaeology, PQS experience is expressly professional experience, not fieldwork, field schools, or other experience tied to the fulfillment of academic degree. A thesis or dissertation is an exception to this rule and can be used to demonstrate professional writing skills, as outlined in the PQS Qualifications Certification Forms.

One area where staff may need additional opportunities to gain work experience is authoring reports. For archaeologists, this often includes authoring excavation reports or comparable studies, as well as the appropriate hours of fieldwork, lab work, and supervisory experience. For architectural historians, it might be writing a thesis-equivalent evaluation report.

Ideas for PQS advancement include, but are not limited to, the following:

- Professional archaeological field schools taken to specifically advance PQS levels while at Caltrans (note that field schools taken in order to graduate from an academic program do not qualify as professional experience).
- Professional, in-depth articles published in peer-reviewed journals.
- Working with orphaned and under-reported archaeological collections, supervised by a PI in the specific field.
- Including Caltrans staff in task orders with project consultants in either a supervisory or crew position, if fieldwork is needed to advance to the next PQS level.
- Facilitate an inter-district work exchange in archaeology and architectural history; this has the added benefit of assisting other districts in completing their project work.
- Volunteer work to gain experience in the field, lab, or writing and evaluation.

Regardless of PQS level, these professional steps can be taken to increase job satisfaction and refresh professional work skills, both of which increase staff's ability to process projects, complete fieldwork, and/or review consultant prepared projects, as well as increasing job retention for skilled staff.

## **Dispute Resolution**

While CSO reviewers conduct impartial reviews to the best of their ability, disagreements with decisions regarding staff PQS qualifications are possible. Such disputes can often be resolved through further discussion clarifying the applicant's education or professional work experience. If the disagreement is not resolved through discussion, a separate reviewer will conduct an assessment of the application. If the second reviewer finds that the applicant does not meet the necessary requirements, the certification will not be granted until the shortcomings are addressed. Upon request, CSO will actively work with specialists on opportunities for PQS advancement (see PQS Advancement above). The ultimate responsibility to certify staff as PQS falls within the purview of the CSO Chief.

## **PQS Demotion and Reinstatement**

The 106 PA/5024 MOU provide substantial cost, scope, and schedule reductions for a large majority of Caltrans cultural resource compliance tasks and are thus a significant benefit to the Department in terms of project delivery. Much of the streamlining benefits of the 106 PA/5024 MOU are due to the delegation of oversight responsibilities to Caltrans that would normally be fulfilled by the SHPO. Though rare, PQS status can be demoted and/or revoked if the PQS demonstrates a pattern of activity that undermines Caltrans's responsible administration of the 106 PA/5024 MOU (e.g., if the PQS shows a critical lack of understanding of the 106 PA/5024 MOU processes, or CSO finds repeated, significant errors in the PQS's studies or documents). Demoting or revoking PQS status is meant to be a temporary action, and with the appropriate effort and documentation it can be reinstated. PQS should work with their supervisor and CSO to create an appropriate plan and timeframe for PQS reinstatement, which is ultimately the purview of the CSO Chief.

## **PQS Status**

PQS certification applies only to responsibilities and activities conducted under the direction of Headquarter and District Environmental, Maintenance or Local Assistance offices by their staff whose primary duty is to conduct cultural resources studies. It is typically suspended

when an individual transfers to a position that does not regularly involve cultural resource studies. Additional training may be required to ensure knowledge of current practices in order to regain PQS status upon returning to a cultural resource studies position. PQS certification terminates upon leaving Caltrans employment. It does not apply to any other work that may be conducted on behalf of any other office, agency, entity, or individual.