



The logo for the Operator Qualification Integrity Process (OOQIP) features the letters 'OOQIP' in a bold, sans-serif font. The 'O', 'Q', and 'P' are blue, while the 'I' is black. The text is centered between two thick horizontal bars: a black bar on top and a grey bar on the bottom.

Operator Qualification Integrity Process

Organizational Values Statement

The Operator Qualification Integrity Process has three key values that provide a north star for our actions:

Everyone has a voice.

The Operator Qualification Integrity Process strives to have a broad, diverse and inclusive set of stakeholders representing the best interests of the industry at large to provide robust conversations and deliberations about how best to improve operator qualification practices and provide a benchmark that participants can use to improve the integrity and veracity of the processes.

Integrity.

The Operator Qualification Integrity Process works to do what is right for the industry and the stakeholders involved through providing leading practices and learning from industry members across the spectrum and keeping the industry obligations to provide safe, efficient and reliable operation of pipeline facilities for our customers as a top of mind focal point.

We support each other on the journey.

Participants in the Operator Qualification Integrity Process have each other's back. We come together to share our journeys and share in the collective wisdom of the team members. We each commit to assist each other in sharing knowledge, practices and information while protecting intellectual property and individual privacy of our respective organizations and customers.

Executive Summary

The United States Department of Transportation (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) enacted the Qualification of Pipeline Personnel Rule in 1999, commonly referred to as the OQ Rule ("the Rule"), which provides minimum standards for the testing and qualification of pipeline personnel.

The Rule proved to be effective in advancing the qualification of pipeline personnel. However, the original requirements were not prescriptive, and so pipeline Operators, Contractors, and OQ providers had to develop individual programs that met the intent of the Rule. With the Rule being open to broad interpretations, Operators' programs were implemented without an industry standard baseline or process, leading to inconsistencies between programs. The Operator Qualification Integrity Process incorporates a framework of high integrity elements intended to enhance Operator Qualification programs.

About this Document

Since the Rule went into effect there have been several initiatives intended to facilitate compliance and standardization with varying OQ requirements overseen by pipeline Operators and the Contractors who build pipeline infrastructure on their behalf. In 2016, the Distribution Contractors Association (DCA) established a task force to investigate whether and how the industry can improve the integrity of the OQ process and provide more consistency in compliance with OQ programs. Recognizing the need for improvement the task force believed a fresh look at potential new approaches to OQ would benefit all stakeholders.

The work of the task force has evolved from a discussion of several OQ-related issues by an ad hoc group of interested stakeholders to a structured and chartered coalition consisting of DCA Contractors, Operators, OQ service providers, industry consulting groups, subject matter experts, and industry associations. This group evolved and built a strong industry coalition on OQ integrity ("Integrity Coalition"), establishing elements for People, Processes, and Programs, including validating measures.

This Process relies on many provisions found within the ASME B31Q Standard on Pipeline Personnel Qualification, and is used as a source document. The ASME B31Q was first published in 2006 and is regularly updated to improve OQ programs and facilitate compliance with the Rule.

The OQIP is a process framework to elevate the integrity of OQ programs across the industry. While increasing consistency and standardization results in "raising the bar" by going above and beyond current regulation, this will be achieved by voluntary actions overseen by OQIP participants. It is intended to serve as a guide for continuous improvement; it is not intended to be the basis of future regulation.

Key Elements

From the beginning, the Integrity Coalition worked to identify and build on a wide range of elements that serve as the backbone for the Operator Qualification Integrity Process ("Process"). These elements are driven by expectations of both Operators and regulators. Consistency of OQ Programs must be achieved through

enhanced training, knowledge testing, and performance evaluation with a system to validate program effectiveness. These elements include People, Process, and Program Validation.

People:

Trainers in the Process require certain prerequisites (i.e., initial training) and must be able to meet a range of responsibilities and renew their training credentials. This applies to both in-house and third-party trainers. (Sec. 5.1)

Proctors require orientation and must have a full understanding of their responsibilities needed to ensure the integrity of OQ testing. (Sec. 5.2)

Evaluators require a standard set of credentials (knowledge, skills, and abilities), a full understanding of their responsibilities, required training, and renewable credentials. (Sec. 5.3)

Auditors for OQIP program effectiveness require training, education, and experience. Auditors must carry credentials, understand their responsibilities, and be able to review records and report audit findings. (Secs. 5.4 – 5.5)

Process:

The OQIP requires *identification of all covered tasks*. The Process relies on the effective processes already established by the ASME B31Q standard for the development of core competencies for covered tasks. Consistent with current OQ regulations, the Process requires an ability to recognize and react to *abnormal operating conditions*. (Sec. 6.1)

A list of *core competencies* must be developed and maintained. (Sec. 6.2)

The Process includes *training requirements* regarding the content needed to provide the knowledge and skills necessary to perform covered tasks. (Sec. 6.3)

Knowledge Testing is a critical part of any OQ program. Minimum number of questions on an exam, maximum time limits, types of questions (multiple choice, true/false, etc.), use of test question banks, and minimum passing scores are all areas that should be considered. Time intervals between test attempts when individuals fail a test, use of proctors and other methods to provide test security, and use of reference manuals are also important considerations addressed in this document. (Sec. 6.4)

While classroom training and testing may be useful methods to initially prepare individuals to perform covered tasks safely, evaluating performance is imperative. *Performance evaluations* are conducted through "on-the-job" observations, simulations, and other methods, with the level of detail of the evaluation based on related core competencies and overall learning objectives. As with knowledge testing, use of testing books, reference manuals, and other training aides during performance evaluations, as well as appropriate wait times between reevaluations, must be carefully considered. Of course, proper records and other documentation regarding continued knowledge and performance observed during performance evaluations is a must. (Sec. 6.5)

Effective *management of change* (MOC) policies are important to pipeline operations and are considered key to maintaining a solid program. The Coalition again relies on the B31Q standard when considering MOC provisions regarding communication both at the company (employee) level and to external audiences to ensure appropriate management and communication of changes. Feedback from OQIP program effectiveness reviews as well as participants in the Process should be considered. Approved changes to the Process will be communicated and properly documented. (Sec. 6.6)

When it is necessary to *suspend or revoke an individual's qualifications*, the Process offers a few rules of engagement, including who should be authorized to suspend qualifications, what processes should be followed, and the conditions of the suspensions or revocations. (Sec. 6.7)

Program Validation:

Audits and other methods to validate the effectiveness of the Process are considered a vital and ongoing part of maintaining effective qualifications of persons working on gas pipelines. The Coalition suggests a range of items for consideration.

Internal audits are imperative to determine if all areas of any OQ program are being followed and if intended goals are being achieved. Procedures, training, testing, evaluations (including field audits of individuals' performance), and records will be conducted using a standardized audit form.

Contractor audits should focus on core competencies and how well the Contractor is ensuring that personnel performing covered tasks are qualified to do so, as well as their ability to recognize and react to AOCs. Review of trainers, proctors, evaluators, and others, as well as training curriculum and evaluation records, are all reviewed under the Process.

Operator audits focus on the operations and practices that are unique to that Operator's implementation of the Process and how well the Operator is ensuring that any contract personnel performing covered tasks are qualified and that they are able to recognize and react to AOCs. Procedures, standards, training, evaluations, and other requirements such as span-of-control, MOC, etc., should be part of an Operator's internal audit. (Sec. 7.1.2)

Consistent with B31Q and previously proposed PHMSA rulemaking action, the Process requires participants to review *program effectiveness*, recognizing this should be included in any program that will be closely examined by regulatory entities. Program effectiveness reviews should include all areas of the Process, including ensuring all personnel performing covered tasks have been provided all company-specific information. Additionally, detailed information regarding how individuals determined to have adversely affected the safety and integrity of an Operator's pipeline are reviewed and what corrective actions are taken.

Knowledge, skills, and abilities (KSAs) and related training/testing regarding covered tasks, MOC, and performance evaluations are all on the "consideration table" during OQIP program effectiveness reviews under the Process. (Sec. 7.2)

OPERATOR QUALIFICATION INTEGRITY PROCESS

Use of *independent, third-party audits* are also included in the Process. Scrutiny by audits, both internal and third-party, lend credibility to Process validation and OQ integrity. Third-party audits should be followed by summaries for the Contractor and Operator that identify areas that need improvement and provide recommendations to address those areas. After comparisons of audits are made, an action plan should be developed that address areas of needed improvement, including communicating any changes to all affected personnel. (Sec. 7.3)

Participants in the Process agree to a range of recordkeeping and documentation requirements to ensure for ongoing integrity. This includes agreeing to work with approved third-party vendor(s) and a range of requirements regarding the use of Contractor and Operator data. (Sec. 7.4)

OQIP Formation

The Integrity Coalition was sponsored by the Distribution Contractors Association under the direction of Rob Darden, Executive Vice President. The Integrity Coalition has since organized as a 501(c)(3), non-profit corporation, known as the OQIP Organization.

The OQIP Organization recognizes and thanks the following individuals and organizations for volunteering their time and expertise to create the OQIP.

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1 PURPOSE

The purpose of this document is to establish a framework of high-integrity elements that are intended to enhance the quality of OQ Programs. Each Operator must have and follow a written qualification program in accordance with regulatory requirements as identified in 49 CFR 192, Subpart N, and/or 49 CFR 195, Subpart G. The Operator Qualification Integrity Process ("Process") is intended to reduce pipeline accidents and incidents due to human error resulting from an individual's lack of knowledge, skills, or abilities during the performance of covered tasks.

2 SCOPE

The Process detailed in this document identifies the specific elements needed for an OQ Program to align to a standard of operation that achieves a consistently high level of integrity and continuity. Adoption of all or part of the Process elements are voluntary.

The Process creates the underlying integrity necessary to promote an environment that recognizes that qualification of core competencies may be attained by participants in the Process, and accepted by other participating organizations.

Specific competencies for covered tasks unique to an individual Operator's pipeline system characteristics, equipment, and procedures must be qualified separately and accordingly.

3 DEFINITIONS

- 3.1 **Ability:** The mental and physical capacity to perform a covered task which may be clearly defined as a covered task (e.g., color vision, visual acuity, hearing, smell).
- 3.2 **Abnormal Operating Condition (AOC):** A condition identified by the Operator that may indicate a malfunction of a component or deviation from normal operations that may indicate a condition exceeding design limits or result in a hazard(s) to persons, property, or the environment.
- 3.3 **Analyst, Program Effectiveness:** An individual who can read, comprehend, and analyze data.
- 3.4 **Audit:** Systematic and independent review to determine whether an OQ program complies with the requirements of the Process.
- 3.5 **Auditor, Independent:** An individual who is authorized to inspect the processes and procedures that are developed to ensure OQ integrity.
- 3.6 **Core Competency:** The specific knowledge and skill an individual must possess and demonstrate to be qualified to perform a covered task.
- 3.7 **Contractor:** A company participating in the Process and hired by a pipeline Operator to perform covered tasks on behalf of the Operator.
- 3.8 **Covered Task:** A task as identified by the Operator.
- 3.9 **Direct and Observe:** The process by which a qualified individual oversees the work activities of a nonqualified individual(s) and is able to take immediate corrective action when necessary.

- 3.10 **Evaluation:** A process established to determine an individual's ability to perform a covered task. The term can be used to refer to the process, instrument(s), or both. The process may entail one or more evaluation methods or one or more distinct evaluation instruments.
- 3.11 **Evaluator:** An individual performing evaluations who possess the required knowledge to (1) ascertain a candidate's ability to perform the covered tasks and (2) substantiate a candidate's ability to recognize and react to abnormal operating conditions that might occur while performing those activities.
- 3.12 **Knowledge:** A body of information that can be applied directly to the performance of a task.
- 3.13 **Mutual Assistance:** Pipeline Operator personnel assistance (aid) provided to another pipeline Operator in the performance of covered tasks.
- 3.14 **On-the-Job Training (OJT):** Instruction at or near the work setting.
- 3.15 **Operator:** an entity that owns or operates pipeline assets and is under the jurisdiction of pipeline safety regulations.
- 3.16 **OQIP: Operator Qualification Integrity Process.**
- 3.17 **Performance:** Demonstration of the knowledge, skills, and abilities (KSAs) required to complete a task.
- 3.18 **Performance Monitoring:** Conducting field audits to confirm that an individual is performing covered tasks in accordance with applicable standards or procedures.
- 3.19 **Pipeline:** All parts of physical facilities through which gas, hazardous liquids, or carbon dioxide moves in transportation, including pipe, valves, fittings, flanges (including bolts and gaskets), regulators, pressure vessels, pulsation dampeners, relief valves, and other appurtenances attached to pipe, compressor units, metering stations, regulator stations, pumping units, breakout tanks, and fabricated assemblies.
- 3.20 **Process:** Elements and requirements of the OQIP as listed in Sections 5 through 7.
- 3.21 **Proctor:** An individual selected to administer a written examination.
- 3.22 **Program Effectiveness (PE):** A process developed to appraise an OQ plan or program, including the Process.
- 3.23 **Qualified:** An individual that has been evaluated and can (a) perform assigned covered tasks (b) recognize and react to abnormal operating conditions.
- 3.24 **Revocation:** A cancellation of an individual's qualification to perform an identified covered task.
- 3.25 **Skill:** The ability to perform mental and physical activities acquired or developed through training or experience.
- 3.26 **Span-of-Control:** The maximum number of nonqualified individuals that a qualified individual can direct and observe performing a covered task.
- 3.27 **Subject-Matter Expert (SME):** An individual who possesses knowledge and experience in the process/discipline they represent.
- 3.28 **Subsequent Qualification:** A process to evaluate, for continued qualification, an individual who is currently qualified to perform a covered task.
- 3.29 **Suspension:** Temporary prevention of a qualified individual from performing identified covered task(s).

- 3.30 **Trainer:** An individual who has been credentialed in accordance with the requirements outlined in the Process and is authorized to serve as a trainer.
- 3.31 **Transferable:** The process in which two or more entities agree to accept identified criteria to satisfy established qualification requirements.

4 REFERENCES

4.1 The following is a list of publications referenced in the Process:

- 4.1.1 U.S. Department of Transportation (DOT) 49 CFR Part 192, Subpart N - Qualification of Pipeline Personnel, and 49 CFR Part 195, Subpart G – Qualification of Pipeline Personnel
- 4.1.2 ASME B31Q Pipeline Personnel Qualification - ASME Code for Pressure Piping, B31

5 PEOPLE

5.1 Trainer

5.1.1 Prerequisites:

- 1) Initial Training – Individual must successfully complete a Trainer program that meets the minimum requirements as outlined in APPENDIX A.

5.1.2 Responsibilities

- 1) Confirm necessary prerequisites are met by participants prior to the start of training.
- 2) Ensure all safety rules and regulations are followed in the classroom.
- 3) Clearly communicate the course objectives (see section 6.3 to ensure core competencies are covered in the training).
- 4) Supply the required training materials and equipment to participants.
- 5) Set expectations; maintain a classroom and hands-on training environment that is conducive to adult learning.
- 6) Ensure all required material is covered.

5.1.3 Credential Renewal

- 1) Trainers shall renew their credentials every three years following the practices outlined in APPENDIX A.

5.2 Proctor

5.2.1 Prerequisites

- 1) There are no prerequisites for serving as a proctor.

5.2.2 Orientation

- 1) Proctors will be required to complete an orientation program outlining their responsibilities as described in 5.2.3. Expectations and responsibilities shall be reviewed and understood, with documentation, for anyone who serves as a proctor.

5.2.3 Responsibilities

- 1) Ensure identification of the participant before the test start time.
- 2) Ensure that the candidate does not bring into the test room or use any unapproved written materials, electronic resources, communication devices,

photographic devices, or any other means to impugn the integrity of the test environment.

- 3) Seating should be comfortable for participants, conducive to a testing environment, and ensure the ability to maintain the security and integrity of the exam.
- 4) Provide time for bathroom and rest breaks, meals, etc., prior to beginning exam.
- 5) Ensure testing process is understood and followed.
- 6) Maintain the integrity of the testing material and testing environment.
- 7) Remain in the room during the test period.
- 8) Ensure there is no talking, cross-looking at others' testing, or cheating.
- 9) Ensure testing records are properly submitted.

5.3 Evaluator

5.3.1 Prerequisites (Knowledge, Skills, and Ability) See APPENDIX B

- 1) Knowledge and Skills
 - a) Technical experience and competency in the covered tasks that they will be evaluating
 - b) Effective interpersonal skills
 - c) Act in an ethical manner throughout the evaluation process.
 - d) Adhere to and interpret applicable standards and performance evaluation/verification documents/records.
 - e) Ascertain an individual's competency to perform a covered task and recognize and react to Abnormal Operating Conditions (AOCs).
- 2) Abilities
 - a) Able to read and interpret applicable company standards and evaluation checklists.
 - b) Individual does not have to hold a current qualification to serve as an evaluator for simulated performance evaluations.
 - i.) All other performance evaluations shall have a qualified individual present, other than the individual who is being evaluated.

5.3.2 Training/ Credentials

- 1) Individual must successfully complete an Evaluator Class that meets the minimum requirements as outlined in APPENDIX B.

5.3.3 Responsibilities

- 1) Comply with all site safety rules and regulations that tie directly to the task(s) being performed.
- 2) Ensure any necessary prerequisites of the covered task(s) are met by the participant prior to the start of an evaluation.
- 3) Emphasize the importance of following manufacturer and Operator specific policies and procedures.
- 4) Consistently apply the performance evaluation review process as outlined in section 6.5.

- 5) Ascertain a participant's competency to perform a covered task and the participant's ability to recognize and react to Abnormal Operating Conditions (AOCs).
- 6) Produce and submit necessary records and documentation.

5.3.4 Credential Renewal

- 1) Evaluators shall renew their credentials every three years following the practices outlined in APPENDIX B.

5.4 **Program Effectiveness (PE) Analyst**

5.4.1 Prerequisites

- 1) The PE Analyst must be able to interpret data to identify, measure, and visualize Program Effectiveness metrics (see Appendix C) resulting from participation in the Process.
- 2) Must be able to follow the processes identified in Section 7.3 of the Process.

5.4.2 Training/Credentials

- 1) Must understand their responsibilities as described in 5.4.3, and the Process requirements.

5.4.3 Responsibilities

- 1) Onsite
 - a) Comply with all site safety rules and regulations on the job site.
 - b) Consistently apply the minimum requirements for an approved Program Effectiveness (defined in Section 3.22) review document.
 - c) Ensure onsite personnel understand what is required during the PE review process.
 - d) Verify identity of the individuals performing covered tasks for records review.
- 2) Records Review
 - a) Conduct review of OQ records, processes, individual stakeholders involved with OQ, and documentation relating to the Process elements and expectations.
- 3) Reporting
 - a) Document and report PE findings as required in Section 7.3 and APPENDIX C.

5.5 **Independent Auditor**

5.5.1 Prerequisites

- 1) Must be able to read, comprehend, and audit to the ascribed Process elements to identify compliance to or deficiency(s) of that Process.
- 2) Must be able to follow the processes identified in Section 7.2 of the Process.

5.5.2 Training/Credentials

- 1) Must understand their responsibilities as described in 5.5.3 and the Process requirements.

5.5.3 Responsibilities

- 1) Onsite

- a) Comply with all site safety rules and regulations on the job site.
 - b) Consistently apply industry-recognized audit practices.
 - c) Ensure onsite personnel understand what is required during the audit process.
 - d) Conduct audits of trainers, proctors, and evaluators administering the OQIP program requirements in accordance with APPENDICES A and B (5.5.1. sub-element 1).
- 2) Records Review
- a) Conduct review of internal audits, OQ records, processes, individual stakeholders involved with OQ, and documentation relating to the Process elements.
- 3) Reporting
- a) Document and report audit findings as required in Section 7.2 and APPENDIX D.

6 PROCESSES

6.1 Covered Task Development & AOCs

6.1.1 The ASME B31Q standard for Pipeline Personnel Qualification has been selected as the task standard for the Process.

The Process is applicable to all tasks identified in the ASME B31Q Standard, non-mandatory Appendix A.

In addition to tasks identified in the ASME B31Q, Operators are responsible to identify and document requirements for all tasks performed on the Operator's system and facilities, even if such tasks are not identified in industry standards such as the ASME B31Q.

6.1.2 Abnormal Operating Conditions (AOCs). The Process has adopted the definition of an AOC as identified in the ASME B31Q.

- 1) ASME B31Q handling of AOCs. The ASME B31Q does not identify general AOCs or task-specific AOCs that correspond directly to each specific task included in the B31Q. However, the B31Q Non-Mandatory Appendix E – Abnormal Operating Conditions (AOCs) provides a baseline list of AOCs which can be utilized in an Operator Qualification program.
- 2) PHMSA Requirements on AOCs. In accordance with 49 CFR 192.803, Subpart N, and 49 CFR 195.503, Subpart G, to be qualified to perform a covered task, individuals must not only demonstrate the knowledge, skill, and ability (KSA) to perform the task but also be able to recognize and react to AOCs that the individual may reasonably be expected to encounter while performing a covered task. Operators are expected to develop a thorough listing of AOCs, both task-specific and generic. The task-specific AOCs may be included within the evaluation criteria for the specific task, but the generic AOCs should be maintained in a separate list and reviewed periodically.

- 3) Process requirements for AOCs. Each content provider participating in the Process shall ensure that appropriate AOCs have been identified and included in their training and evaluation content in accordance with the guidance from the ASME B31Q, PHMSA, and industry practices.
 - a) Content providers shall ensure that each task-related training and evaluation content shall include corresponding task-specific AOCs as part of the qualification requirements of the covered task.
 - b) Content providers are encouraged to ensure their programs offer training and evaluation content for generic AOCs.
 - c) It is the responsibility of the Operator to ensure that any Operator-unique or specific AOC requirements and reaction protocols (for generic AOCs or task-specific AOCs) are included in the Operator-specific portion of a worker's qualification.

6.2 Core Competency Development

- 6.2.1 The Process relies on the ASME B31Q for the identification and development of tasks and associated core competencies. The Process does not develop these core competencies. ASME B31Q utilizes a comprehensive process and subject matter experts (SMEs) from across multiple industry segments to determine covered tasks, appropriate evaluation methods, and the core competency knowledge, skill, and ability requirements associated with each task. These processes are outlined in the Nonmandatory Appendices of the ASME B31Q.
- 6.2.2 The Process relies on the processes established by the ASME B31Q for the development of core competencies for covered tasks. The National OQ Integrity Committee Task Force Members shall provide guidance and input to the ASME B31Q regarding core competency development based on feedback from Process participants and stakeholders, information obtained through Section 7 – Program Effectiveness of this Process, and general guidance from the OQIP committee members.

6.3 Training Requirements

- 6.3.1 Training materials must include content necessary to convey the knowledge and skills necessary to perform a task in alignment with the core competencies identified in the ASME B31Q, Appendix A – Non-Mandatory Integrated Task List.
- 6.3.2 Training content should sufficiently prepare an individual to perform covered tasks, including consideration for the individual's required knowledge and skills.
- 6.3.3 Training material should be developed using industry best practices for identification of learning objectives and content development. As such, training content utilized in the Process should be developed utilizing methodology established by IACET (International Association for Continuing Education and Training), ANSI (American National Standards Institute), Association for Talent Development (ATD), or similar industry-recognized and accredited programs intended for the development of training and educational content.

6.4 Knowledge Testing

- 6.4.1 Minimum number of questions per exam
 - 1) Minimum one (1) question per learning objective (including AOCs) or subset thereof
- 6.4.2 Exam time limits: Exam time limits can serve to assist in validating knowledge proficiency (i.e., the ability to demonstrate knowledge in a reasonable response period). Exam time limits are not required but should be administered with consideration to needs of the participant (reasonable accommodations, new qualifications, subsequent qualifications, etc.). Explanatory Note: For general guidance, 30-60 seconds per exam question is a typical acceptable response period. As such, it is recommended that total examination time should be based on three (3) minutes per exam question, not to exceed three hours for any given exam.
- 6.4.3 Exam question types (multiple choice, matching, sequencing, true/false, etc.)
 - 1) Limit number of true/false questions per exam
 - a) Not more than 10% of total questions
- 6.4.4 Test Question Banks
 - 1) At least two equivalent questions per learning objective or subset thereof
 - 2) Randomized question order for exams
 - 3) Randomized answers for a given question, where appropriate
- 6.4.5 Minimum passing score
 - 1) Eighty percent (80%) minimum to pass knowledge exam. (Note the additional requirements in 6.5.2 (2)).
- 6.4.6 Test attempts
 - 1) Second attempt allowed after documented post-test conference between candidate and designated personnel for issue review.
 - 2) Third attempt allowed after documented post-test conference between candidate and designated personnel for issue review and remediation plan, as appropriate.
 - 3) Additional attempts after documented developmental training, field practice with a qualified individual, and/or structured On-the-Job Training (OJT).
- 6.4.7 Lock-out/waiting periods between test attempts
 - 1) Upon the failure of a first attempt, a candidate must wait a minimum of 24 hours before re-attempting the same exam.
 - 2) Upon the failure of a second attempt, a candidate must wait a minimum of 48 hours before re-attempting the same exam.
 - 3) Upon the failure of a third or subsequent attempt, if allowed, a candidate must wait a minimum of 72 hours between each attempt of the same exam.
- 6.4.8 Proctoring
 - 1) Proctoring is required on all tests.
- 6.4.9 Test Security
 - 1) Computer Based/Electronic Testing
 - a) Digital records of individually identifiable test results must be retained by the test provider.

- b) Access to the test materials must be controlled by company program administrators.
- c) Detailed records for OQIP program effectiveness analytics and audits must be retained by the test provider.
- 2) Paper Based/Oral exams.
 - a) Records of individually identifiable test results must be retained by the test provider.
 - b) Access to the test materials must be controlled by Program administrators.
 - c) Paper copies must be kept in a secure location.
 - d) Detailed records for OQIP program effectiveness analytics and audits must be retained by the test provider.
 - e) Electronic delivery of exams is the preferred method and should be utilized wherever technology and internet access allow.

6.4.10 The use of Training Books or Study Aids is not allowed during the examination process. Technical Reference Materials may be used and should include a company's policies and procedures that are available in the field, such as Operation & Maintenance Manuals, Standard Operating Procedures, Construction Manuals, and other similar official policies and procedures.

6.5 Performance Evaluations

6.5.1 Evaluations shall be completed by authorized Evaluators per the requirements of Section 5.3 Evaluator.

6.5.2 Evaluation environments/conditions (on-the-job, simulations, equipment requirements, etc.).

- 1) Mandatory Requirement.
- 2) Pass/Fail. This requires evaluator judgement that the individual performed satisfactory on each item.
- 3) On-the-job/field and simulated environments are allowable.
- 4) Equipment that is significantly similar to production environment.
- 5) Must be conducted in an environment without other candidates present.

6.5.3 Level of detail.

- 1) Detailed based on core competencies and learning objectives.
- 2) AOC's must be addressed in the performance evaluation.

6.5.4 Reference Materials Allowed During Evaluation

- 1) Training Books/Study Aides: No.
- 2) Technical Reference Materials relied upon when performing task: Yes. Technical Reference Materials may be used and include a company's policies and

procedures that are available in the field, such as Operation & Maintenance Manuals, Standard Operating Procedures, Construction Manuals, and other similar official policies and procedures.

6.5.5 Evaluation Attempts

- 1) A second attempt is allowed after a documented post-evaluation conference between the candidate and designated personnel for issue review.
- 2) A third attempt is allowed after a documented post-evaluation conference between the candidate and designated personnel for issue review and remediation plan, as appropriate.
- 3) Additional attempts are allowed after documented developmental training, field practice with a qualified individual, and/or structured On-the-Job Training (OJT).

6.5.6 Failed Evaluation Waiting/Re-Evaluation Period

- 1) Upon the failure of a first attempt, a candidate must wait a minimum of 24 hours before re-attempting the same evaluation.
- 2) Upon the failure of a second attempt, a candidate must wait a minimum of 48 hours before re-attempting the same evaluation.
- 3) Upon the failure of a third attempt, a candidate must wait a minimum of 72 hours before re-attempting the same evaluation.

6.5.7 Record keeping

- 1) All passed evaluation, both knowledge, and performance, must be recorded and retained.
- 2) All failed evaluation attempts, both knowledge, and performance, must be recorded and retained.
- 3) The individual's employer must be notified or have access to test results.

6.6 Management of Change

6.6.1 Communication requirements of the Process.

- 1) The Process will follow Section 12 of the ASME B31Q with regards to managing changes related to the Process.

6.6.2 Communication requirements at the participating company level.

- 1) Participants in the Process program should follow the ASME B31Q or similar methodology to ensure appropriate management and communication of changes.

6.6.3 Communication requirements of participating companies to the OQIP.

- 1) Feedback from company OQIP program effectiveness reviews to the OQIP program administrator.
- 2) Feedback from participants, including OQIP program effectiveness results identified in Section 7.2 of this document, should be submitted by participant administrators to the OQIP program administrator.
- 3) Feedback will be reviewed by the OQIP program administrator for assessment and revision to Program standards and requirements.

6.7 Suspension/Revocation of Qualifications Due to a Failed Evaluation

6.7.1 Who can Suspend/Revoke.

- a) Operators

- b) Contractors
- c) Service Providers

6.7.2 Documentation

- a) The suspension or revocation of an individual's qualification to perform a covered task shall be recorded and reported in accordance with the recordkeeping and record sharing requirements outlined in Section 7.4.7 and 7.4.9.

7 PROGRAM VALIDATION

7.1 Incident Investigation

7.1.1 Overview

At any time that an incident (defined in 49 CFR 191.3) occurs while an individual in this Process is performing a covered task, an investigation shall be initiated to determine if the individual's performance of the covered task contributed to the incident.

7.1.2 Process

Upon notification of the incident, the individual shall be suspended from performing the specific covered task(s). At a minimum, a Contractor's representative shall interview the individual to determine what actions were taken while on the site leading up to the incident. This will consist of determining what procedures and equipment were used and steps the individual had completed at the time of the incident. This review shall also question if AOCs were recognized and if any action was taken to mitigate them.

If at the end of the interview it is determined the individual did not contribute to the incident, the suspension is lifted, and the individual may perform those covered tasks in question. If it is determined the individual did contribute to the incident, they will be disqualified. Depending on the findings, training may be required prior to an evaluation.

If no determination was made after the interview, the individual shall remain suspended until the incident investigation is finalized. If it is determined the individual did not contribute to the incident, the suspension is lifted, and the individual may perform those covered tasks in question. If it is determined the individual did contribute to the incident, the individual will be disqualified. Depending on the findings, a training plan shall be developed to re-qualify and re-evaluate the affected individual to ensure they can perform the disqualified covered tasks.

The suspension or disqualification of an individual's qualification to perform a covered task shall be recorded and reported in accordance with the recordkeeping and record sharing requirements outlined in Section 7.5.

If performance of a covered task that adversely affects an Operator's pipeline results in an accident or incident, the information gathered during the investigation process may require immediate actions be taken to minimize the likelihood of reoccurrence.

- 1) If at some time a Contractor employee adversely affects the safety and integrity of the Operator's pipeline, information shall be gathered to determine the reason

for the occurrence. The Operator should interview the individual and any other personnel who may be a witness.

- 2) If performance of a covered task that adversely affects an Operator's pipeline results in an accident or incident, the information gathered during the investigation process may require immediate actions be taken to ensure there is no reoccurrence of the accident or incident.

7.2 Internal Audit

7.2.1 Overview

At prescribed intervals identified in Section 7, an internal audit shall be performed by each participating Contractor and Operator to determine if all facets of their OQ program are being met. An internal audit would include a review of procedures, records, training, evaluations, and a field audit of personnel performing covered tasks. An audit form should be utilized by all auditors which addresses all Process elements.

7.2.2 Process

- 1) Contractor
 - a) For internal audits, Contractors' primary focus should be on the core competencies of the Process. Contractors are held responsible for ensuring any personnel performing covered tasks for an Operator are qualified. This would consist of training and evaluation on the core elements of each required covered task, including abnormal operating conditions.
 - b) An internal audit will require a review of current trainers, proctors, evaluators, and other personnel in responsible positions. The personnel review will ensure that current trainers, proctors, evaluators, and other personnel meet the established criteria of the Process.
 - c) An internal audit will require a review of training, evaluation, and qualification records associated with the covered tasks each individual is qualified to perform.

NOTE: Internal audits may require the auditor to review processes and records from the associated third-party service provider.

- 2) Operator
 - a) For internal audits, an Operators' primary focus should be on the unique operations and practice of their OQ program and the Process. Operators are held responsible for ensuring any Contractor personnel performing covered tasks on their facilities are qualified. It is recommended that the Operator review and validate each Contractor's core competencies for each task identified in the Operator's OQ program. This would consist of any Operator-specific procedures, standards, training, additional evaluations, abnormal

operating conditions, and facility requirements that would not be covered by the core elements for the covered tasks each Contractor has been qualified to perform.

- b) Additional requirements of the Operator (i.e., span-of-control, change communication of covered task, Program Effectiveness) may also be reviewed as a part of the internal audit.

7.3 Program Effectiveness Review

7.3.1 Overview

With the development of the Process, Program Effectiveness (PE) is a required element that must be implemented by each participating Operator, Contractor, and subcontractor. Although not currently required by Federal regulation, Program Effectiveness is an important aspect of any program that may receive regulatory scrutiny by outside entities.

The findings of a Program Effectiveness review may require changes addressed at the contractor company, the OQIP, third party service provider, or the Operator level.

7.3.2 Process

- 1) At an interval of each calendar year, not to exceed 15 months, a Program Effectiveness review shall be performed to measure the OQIP program effectiveness as it relates to Operator qualification.
- 2) As Contractor/subcontractor employees could be performing covered tasks for many Operators in a given year, each Operator that utilizes the Process will be responsible for ensuring individuals have been given all company-specific information to correctly perform the covered tasks on their facilities.
- 3) Each Contractor shall interview the individual in question to make a determination. Some Contractors may have their own OQ program.
- 4) In addition to assessment of specific PE elements identified in APPENDIX C , utilization of an interview process may provide insight and information that an individual made certain choices, regardless of their training and evaluation, that adversely affected overall Program Effectiveness. These could include, (1) choosing to not follow the procedure, (2) attempting to perform the task that they had not performed in a number of months, (3) a distraction, or (4) influence or pressure from another individual.

7.3.3 Outcome: Records must be maintained as outlined in APPENDIX E of the Process

- 1) A report must be developed that details the findings of the PE review.
- 2) An action plan shall be developed to address the correctible findings within the Contractor's Process.
- 3) As changes are implemented, notifications should be made to all stakeholders affected by the changes, including employees (Operator or Contractor), trainers, proctors, evaluators, auditors, and others.
- 4) If findings are made that relate to an Operator, third party provider, or the OQIP , that information shall be forwarded those entities for their knowledge and action.

7.4 Independent Audits

7.4.1 Overview

The development of the Process raises the bar of expectation, from Contractors to Operators and Operators to regulators. Additional scrutiny through audits, both internal and by independent, substantiate the integrity of the Process. Requiring two audits differentiates the Process from most other OQ programs in the industry, where some audits are performed but rarely by non-partisan personnel.

Internal audits and independent audits are required for any Contractors and Operators who subscribe to the Process to ensure the Process elements are followed by all parties.

7.4.2 Process

1) At prescribed intervals (after the first year of application and every three years afterward), after internal audits have been performed, a non-partisan individual should perform an independent audit on each Contractor and Operator participating in the Process. This individual should evaluate the same elements for adherence to the Process, dependent on whether Contractor or Operator. A standardized form should be utilized by all auditors. The auditor shall only be allowed to review information associated with the specific Operator, Contractor, and/or the Contractor's training provider as it related to the scope of the audit.

a) Contractor:

1) An independent auditor, as required by the Process program should perform the independent audit for the Operator. An individual from an Operator can perform a partial third-party audit of the Contractor if that company individual meets the requirement of an independent auditor of the Process.

b) Operator:

1) An independent auditor, as required by the Process should perform the independent audit for the Operator.

2) Audit elements have been identified and aligned into specific requirements and list who is responsible for addressing each item (different work contracts may carry different responsibilities). The elements and the responsible party are described in APPENDIX D.

7.4.3 Outcome

1) Independent audits will have an executive summary developed for the Contractor and company. The summary will address the elements of the Process that need improvement and provide recommendations to address those needs.

2) Once a Contractor or Operator receives their independent audit, a comparison should be made to the internal audit. An action plan shall be developed to address the correctible findings within the Contractor's Process. As changes are implemented, notifications must be made to all affected by the changes, which may include employees, trainers, evaluators, and others.

- 3) If findings are made that relate to an Operator, third-party provider, or the OQIP, that information must be forwarded those entities for their knowledge and action.
- 4) Critical findings: If an independent auditor discovers areas of the Process that have not been met, i.e., evaluators not meeting established criteria, training requirements are not being met, or evaluations not being performed as required, the OQIP Organization gatekeeper shall be notified with details about the critical program findings. The OQIP Organization will make notification to the Operators affected and relate findings of the audit. If disqualifications must be implemented, the respective record holder(s) shall be notified.

NOTE: If performance of a covered task that adversely affects an Operator’s pipeline results in an accident or incident, the information gathered during the investigation process may require immediate actions be taken to ensure there is no reoccurrence of the accident or incident.

7.5 Recordkeeping and Documentation

- 7.5.1 This section identifies the necessary documents and records required to support the Process, with consideration for Process quality, auditability, Program Effectiveness review, transferability of qualifications, and compliance with Federal OQ Regulations.
- 7.5.2 Operators and Contractors that choose to be a part of the Process must utilize an approved program (internal or third-party vendor) for training, testing, and record-keeping of the required Process elements. These records could be delivered to an in-house system. Any third-party record systems must be approved and meet the security requirements for the Process, as well as cyber security and personal information requirements.
- 7.5.3 In addition to any employer or third-party ID numbers utilized, a unique and nationally recognized identification number will be utilized for validation of a worker and their associated records. The requirement and methodology for generating a unique identification number will be developed and held by the OQIP Organization, or their designee (such as the OQIP governing body), as part of the Process. Participating entities will be provided with the necessary information to generate the unique identification number.
- 7.5.4 Records of individual employees shall be transferrable to any third-party that is approved by the Process. A standard transcript report format will be created and included as APPENDIX F and must be maintained in each reporting system that captures the same data fields for each individual based on the recordkeeping requirements outlined in APPENDIX E of this Process. Records shall include the requirements in 49 CFR 192.807 and/or 49 CFR 195.507, Recordkeeping, which states *“Each Operator shall maintain records that demonstrate compliance with this subpart.*
“Qualification records shall include:
 - (1) Identification of qualified individual(s);
 - (2) Identification of the covered tasks the individual is qualified to perform;

(3) *Date(s) of current qualification; and*

(4) *Qualification method(s)."*

- 1) Individual's current qualification shall be maintained while the individual is performing the covered task.
 - 2) Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five years or as required by Federal Regulation, whichever is greater.
 - 3) Records indicating the OQ content provider shall be maintained.
- 7.5.5 The records from section 7.5.4 will be the approved transcript that will be requested and transferred from system to system. Fields required for the transcript report must include the fields outlined in APPENDIX E. Each individual will be assigned a specific unique identification number as outlined in 7.4.3 above.
- 7.5.6 Record retention is based on a contract with Operator/Contractor and the service provider. In the event of contract cancellation, the service provider will send a data file containing all records to the Operator/Contractor in the format that is documented in APPENDIX F - Transcript Report.
- 7.5.7 Reporting of records that are intended to be transferable (e.g., Contractor/Operator mutual assistance) must come from an approved Process participant. Internal LMS systems and databases may be used as a backup of records, but to maintain the integrity of records at a national level, all source records must be standardized, maintained, and managed from an approved provider that has a system that requires lockouts, workflows, and controls, and is audited so that the entire Process is using the same standard guidelines.
- 7.5.8 Each OQIP program's database must transfer routine record updates at least daily. Non-routine record updates such as revocations and suspensions must, during normal business hours, be communicated within two hours of the decision to revoke or suspend. If the decision is made outside of normal business hours, the revocation or suspension must be communicated no later than 8 am local time.
- 7.5.9 The core competencies associated with tasks are described in the ASME B31Q Non-Mandatory Appendix A - Integrated Task List will be transferable and shall have the ability to be transferred throughout the industry by request of transcript. The transcript report will be sent by the third-party administrator to a corresponding third-party administrator for transfer. The individual may not submit transcripts personally. The portion of any qualification that is specific to each Operator is not considered transferable under this Process and is owned by the Operator. The Operator specific portion of a qualification record may be stored in-house or contracted to be serviced through a third-party provider.
- 7.5.10 The Process will develop and maintain a communication process between third-party provider, Operator, and Contractor members for qualifications and personnel, including, but not limited to:

- 1) **Qualifications:** Each qualification will be reported in a standardized transcript report, utilizing the format shown in APPENDIX F. It must be an official transcript that is transferred from an approved system.
- 2) **Trainers:** The information relevant to each qualified trainer will be stored in an approved system.
- 3) **Revocation:** Revocations of a task must be updated and communicated out to the Program network within two hours of the decision to revoke.
- 4) **Evaluators:** The information relevant to each qualified evaluator will be stored in an approved system.
- 5) **Suspensions:** Suspensions of a task must be updated and communicated out to the central database within two hours of the decision to suspend.
- 6) **Proctors:** The information relevant to each qualified proctor will be stored in an approved system.

8 LEGAL

8.1 Legal Formation. The Operator Qualification Integrity Process is organized and operates as a 501(c)(3) non-profit organization and is structured as a Texas Corporation. The OQIP is governed under the Articles of Incorporation, and the established Rules and By-Laws of the Operator Qualification Integrity Process Organization.

APPENDIX A

Trainer Program (Minimum Training Requirements)

1.0 Trainer Qualification

A trainer must successfully complete a training class that meets the minimum requirements for a technical trainer program as outlined below.

2.0 Prerequisites

2.1 Must meet one of the following requirements prior to becoming a credentialed trainer:

2.1.1 Minimum of five years of experience performing the functions which the individual will train on, OR;

2.1.2 Three years of experience performing the functions which the individual will train on, AND, a minimum of two years of experience at a supervisory level or higher in the natural gas industry, AND, specific to the covered task the training will be the subject of, OR;

2.1.3 An associate degree or higher in education, AND, a minimum of three years of experience performing the functions which the individual will train on, OR;

2.1.4 Two years of experience as a trainer, AND a minimum of three years of experience performing the functions the individual will train on, OR,

2.1.5 Successful completion of an Original Equipment Manufacturer (OEM) Train-the-Trainer credentialing program, AND a minimum of three years of experience performing the OEM functions which the individual will train on.

3.0 Classroom Training

3.1 Learn the basics of adult learning theory.

3.2 Gain the basis for conducting a needs assessment and developing learning objectives.

3.3 Learn effective training techniques for leading classrooms and engaging a variety of learning styles.

3.4 Practice classroom facilitation, student engagement, and presentation skills through exercises.

3.5 Reinforce trainer characteristics to include ethics, judgment, consistency, patience, temperament, etc., through exercises.

4.0 Records and Validation

4.1 Training records maintained by Employer, and/or Employee, and/or Training Organization Provider.

4.2 Random audits are performed on trainers as provided for in the Process.

APPENDIX B

Evaluator Training Program (Minimum Training Requirements)

An Evaluator must successfully complete an evaluator training class as outlined below.

- 1.0 Prerequisites
 - 1.1 Three years of gas industry experience in the covered task to be evaluated, OR;
 - 1.2 One year of general gas industry experience, AND, an industry-recognized certification or credential (e.g., NACE, ASNT) that evidences the necessary expertise in the covered task to be evaluated, OR;
 - 1.3 One year of general gas industry experience AND successful completion of an OEM Train-the-Trainer credentialing program for the activity to be evaluated.
 - 1.4 Submit required documentation, which includes:
 - 1.4.1 Resume outlining employment history and industry work experience
 - 1.4.2 Two (2) letters of reference related to relevant work experiences
 - 1.4.3 Photo identification
 - 1.4.4 List of covered tasks that they are eligible to evaluate (each covered task requires a minimum of three years of experience in that task)
 - 1.5 The evaluator training program does not include any technical training. That is completed outside of the evaluator training.
- 2.0 Classroom Training
 - 2.1 Class purpose, objectives, etc., are reviewed.
 - 2.2 Basic Introduction of Operator Qualification (OQ), including applicable standards
 - 2.2.1 OQ Rule, 49 CFR 192 and 195; PHMSA Inspection Protocols
 - 2.2.2 ASME B31Q
 - 2.3 Evaluator characteristics
 - 2.3.1 Includes ethics, judgment, consistency, patience, temperament, and observation skills. Exercises will be used to emphasize characteristics needed.
 - 2.4 Evaluator processes
 - 2.4.1 Pre-planning
 - 2.4.1.1 Evaluation materials and site preparation; notifications
 - 2.4.2 Conducting the evaluation
 - 2.4.2.1 Introductions and verification of individual/check ID
 - 2.4.2.2 Set the ground rules.
 - 2.4.2.3 Closely adhere to the performance evaluation documentation requirements.
 - 2.4.2.4 Manage problem situations (class exercises).
 - 2.4.3 Post evaluation
 - 2.4.3.1 Communication of results and performance feedback
 - 2.4.3.2 Records/documentation
 - 2.5 Evaluator exercises to underscore key issues

3.0 Records and Validation

- 3.1 Evaluator training records shall be maintained by the Employer, and/or Employee, and/or Training Organization Provider
- 3.2 Random audits are performed on evaluators as provided for in the Process.

APPENDIX C

OQ Program Effectiveness Elements

In Development

APPENDIX D

Addressing Deficiencies

The following areas are broken down into specific requirements and parties responsible for addressing the deficiency (different work contracts carry different responsibilities):

1.0 Operator:

- 1.1 KSAs for the specific covered task(s) were not adequately determined.
- 1.2 Training was not adequate for the specific covered task(s).
- 1.3 Change to a covered task(s) or the KSAs was not adequately communicated.
- 1.4 Nonqualified individual was not being directed and observed by a qualified individual.
- 1.5 Span-of-control was not followed.
- 1.6 The qualified individual supervised more than one covered task at the time.

2.0 Program:

- 2.1 Core elements of covered task did not adequately address the covered task.
- 2.2 KSAs for the specific covered task(s) were not adequately determined.
- 2.3 Change to a covered task(s) or the KSAs was not adequately communicated.

3.0 Service Provider:

- 3.1 Evaluator or training did not follow Program or meet requirements.
- 3.2 Evaluation was not conducted properly.
- 3.3 Training was not adequate for the specific covered task(s).

4.0 Contractor:

- 4.1 Evaluation was not conducted properly.
- 4.2 Training was not adequate for the specific covered task(s).
- 4.3 Individual failed to recognize an abnormal operating condition, whether it is task specific or non-task specific, which occurs anywhere on the system.
- 4.4 Individual was not qualified.
- 4.5 Nonqualified individual was not being directed and observed by a qualified individual.
- 4.6 Span-of-control was not followed.
- 4.7 Evaluator or training did not follow Program or meet requirements.
- 4.8 The qualified individual supervised more than one covered task at a time.
- 4.9 A Contractor with their own OQ program will have to determine at least one other measure to review for Program effectiveness. Any area chosen for review must be measurable. Additionally, it must be possible to document the element. Some areas for consideration include the following:
 - 1) Performance of Line Locating – Percentages of mismarks/non-locates
 - 2) Performance of Excavation – Percentages of damages per excavation
 - 3) Disqualifications – Look for trend of issues, i.e. complacency, training
 - 4) Construction – Excessive repair and material waste

APPENDIX E

Recordkeeping

Key records for OQ integrity and standardization to support the transfer and sharing of records have been outlined below. These records include regulatory requirements and additional requirements to support Program audits, Program effectiveness reviews, and an increased level of qualification integrity.

- 1.0 Current Employer Company Name
- 2.0 Employee Name
 - 2.1 Employee Last Name
 - 2.2 Employee First Name
 - 2.3 Employee Middle Name/Initial (if any)
 - 2.4 Employee Suffix (if any)
 - 2.5 Unique identifier (employee ID number or last four digits of SSN)
- 3.0 Task Information
 - 3.1 Name of Covered Task
 - 3.2 Number Reference of Qualified Task
 - 3.3 Training Completed Date (*could appear as part of task or as part of individual evaluation methods*)
 - 3.4 Date of Task Expiration
 - 3.5 Employer Company Providing/Sponsoring Qualification
 - 3.6 Service Company Supporting/Delivering Qualification
 - 3.7 Appropriate notations for the existence of current or historical suspensions or disqualifications associated with the reported record
- 4.0 Evaluation Method(s) – Per each task above
 - 4.1 Type of Evaluation Method (knowledge, observation/performance)
 - 4.2 Format for evaluation delivery (electronic, paper, oral)
 - 4.3 Training Completed Date (*could appear as part of task or as part of individual evaluation methods*)
 - 4.4 Number Reference of Evaluation Method
 - 4.5 Number of attempts to pass (per qualification cycle)
 - 4.6 Date of Qualification Completion
 - 4.7 Date of Qualification Expiration
 - 4.8 Exam/Evaluation Score: Grade 80% or Passed/Failed Status
 - 4.9 Name of Proctor or Evaluator
 - 4.9.1 Evaluator (or proctor) Training Date
 - 4.9.2 Company Providing Evaluator Training
 - 4.9.3 Evaluator Credentialed Date
 - 4.9.4 Company Providing Evaluator Vetting/Credentialing

APPENDIX F

Recordkeeping Transcript Report – Standard Format

To Be Determined

APPENDIX G

Sample Audit Template – Standard Format