

OO Integrity Coalition

Establishing High Credibility in a Universal Approach to
PHMSA's Operator Qualification Expectations

Brad Heck
Director of Corporate Compliance
Miller Pipeline, LLC



OQ Integrity Coalition

Our Industry-Focused Challenge:

Design the OQ Process to establish a high level of Integrity in the delivery of all aspects of OQ, which ultimately provides for credible and valid Qualifications of each identified task's Common Core Competencies being transferable.



Coalition Members: 25 Organizations

Rob Darden

Executive Vice President
Distribution Contractors Association

Brad Heck

Chair. Director of Corporate Compliance
Miller Pipeline

Jaeson Osborn

Vice-Chair. Executive Vice President
Ellingson Companies

Mike Hickey

Executive Vice President
The Hallen Construction Company

Ben Nelson

Vice President of Western Operations
Michels Corporation

Kevin Parker

Vice President, Safety, Training &
Environmental
Mears Group, Inc.

Christina Sames

Vice President, O&E
American Gas Association

Gary Hines

Vice President
Southern Gas Association

Troy Nutter

Manager, Operations Training
Puget Sound Energy
(Western Energy Institute - WEI)

Richard Stump

Director of Compliance Programs
Midwest Energy Association

John Erikson

Vice President of Operations
American Public Gas Association

Paul Armstrong

Operations Services
Northeast Gas Association

Stephanie Balmer

President
Industrial Training Services

Geoff Isbell

President
ENERGY, worldnet, Inc.

Jim Webb

Vice President
eWebOQ

Warren Miller

Principal
Warren Miller Enterprises

Eben Wyman

Principal
Wyman Associates



Coalition Members: 25 Organizations

Erin Kurilla

Director of Operations & Safety
American Public Gas Association

Kofi Woodley

Engineering Services Manager
American Gas Association

Andrea Martinez

Compliance Project Manager
New Mexico Gas

Mike Burkhart

Principal
The Burkhart Group
Chair; ASME B31Q Committee

Angela Serrano de Rivera

Director of Engineering & Technical
Services
New Mexico Gas

Angela Loftis

Supervisor, OQ & Technical Training
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ENERGY, worldnet, Inc.

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Kinder Morgan

Sean Mayo

Director, Pipeline Safety
Washington UTC/NAPSR

Jason Montoya

Bureau Chief, Pipeline Safety Bureau
New Mexico PRC/NAPSR

Dave Chislea

Manager, Gas Operations Section
Michigan PSC/NAPSR



Coalition Members



Coalition Members



OQ Integrity Program Stakeholders



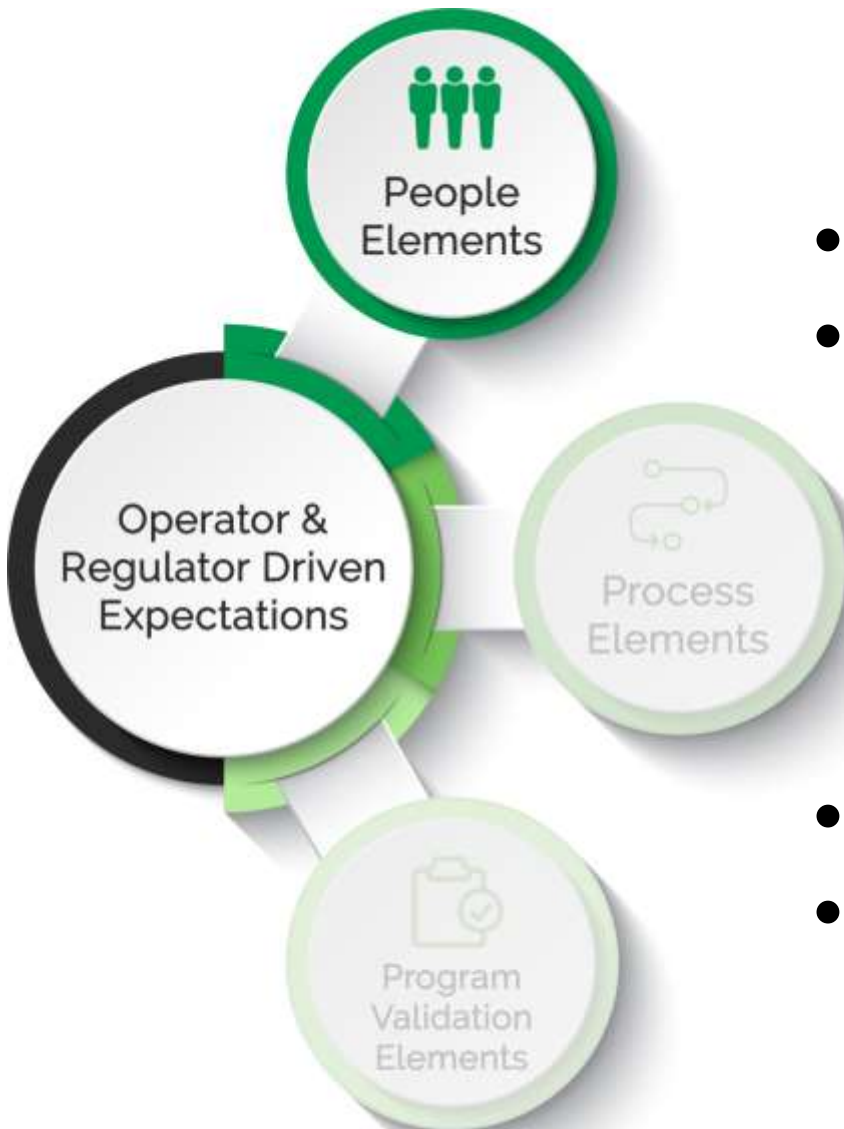
Each entity has it's own needs and benefits from a Transferable Qualification Program.

Operator/Regulator Driven Expectations



- KSA & Process **Consistency**
- Regulatory **Compliance**
- **Exceeds** Minimum
- Focus on **Core Competencies**
- **Operators Control** O&M Specifics
- Program **Effectiveness**
- **Verifiable** via Audits & Records
- Benefits **Workforce Development**

People Elements



- Trainers | Proctors | Evaluators | Auditors
- Selection **Criteria & Credentialing:**
 - Education
 - Training
 - Experience
 - Qualifications & Certifications
- **Quality Validation** & Re-authorization
- Internal & External/Third-Party

Program Elements for People Credentials

- Credentialed Trainers, Proctors, Evaluators & Auditors
- Requires Industry Accepted Credentialing
- Combo of Education, Training and/or Experience
- Must Maintain and Refresh Credentials
- Subject to Audit and Program Effectiveness Reviews

Process Elements



- ASME B31Q Standard & Covered Task List
- Detailed Core Competency Development
- Program Focus on universal truths
- Training Curriculum Consistency
- Testing Methodology, Integrity & Security
- Skill & Ability - Observe/Verify Performance
- Management of Change Controls

Program Elements for Core Knowledge

- Learning Objectives align directly to B31Q core
- At least 1 test question per learning objective
- < 10% True/False Questions
- Exam Time Limits = 3 minutes per question
- Banked Test Questions (back-up, rotation & random)
- 80% Minimum Score to pass knowledge exam
- Lock-out/wait periods (24/48/72 hour waits after fail)
- Electronic Testing preferred – paper ok with records
- Proctoring required

Program Elements for Core Performance

- Observed steps align directly to B31Q core
- AOCs must be included
- Actual performance required (simulation or field)
- Must use vetted/credential evaluators
- Electronic Testing preferred – paper ok with records
- Track both passed and failed evaluation attempts
- Waiting periods (24/48/72 hour waits after fail)

Program Elements for Recordkeeping

Individual Worker	Task	Evaluation Method
Last Name	B31Q Task Name	Type (knowledge/performance)
First Name	Task ID Reference Number	Format (electronic/paper)
Middle Name/Initial	Training Completed Date	
Suffix	Task Expiration Date	Evaluation Expiration Date
Unique ID Number	Source of Qualification	Evaluation Completion Date
	Flags for Suspension Records	Number of Attempts to Pass
		Exam Score and Pass/Fail Status
		*Trainer/Proctor/Evaluator Info

**Credentials for Trainers, Proctors, Evaluators and Auditors must be maintained, including name and ID info, and date and source of credentialing*

Program Validation Elements



Program Compliance Validation:

- Internal **Self-Audit &** Program Effectiveness Reviews
- Independent Third-Party **External Audits**
- Recordkeeping/Documentation

Program Elements for Reviews & Audits

- Internal Self-Audits for Alignment with Program
- Annual Internal Program Effectiveness Review
- External/Third-Party Audits (1st year & every 3 years)
- Credentialed Auditors (internal and external)
- Retained Audit Records
- Audit Result Oversight by Program Governing Body

Program Summary

A standardized, credible, and valid process of deploying Integrity in OQ for our industry will increase OQ compliance and transferability, and also create **Synergy** and **Win-Win** scenarios for:

- ✓ Enhanced Operator Qualifications
- ✓ Continuous Improvement & Program Effectiveness
- ✓ Increased Accountability & Transparency
- ✓ Risk Mitigation & Regulatory Confidence
- ✓ Workforce Development

Next Steps

- ✓ Engage more Industry Stakeholders
- Finalize the OQ Integrity Program Document
- Form Governance body
- Deploy a Pilot Program
- Monitor and Measure Results
- Revise OQ Integrity Program Document, as needed
- Publish & Communicate Results
- Enlist Industry Support and Engagement
- Initiate Program Implementation

Q & A



Thank you.

