Restoration of OQ Services following the COVID-19 State of Emergency

Updates:

- April 10, 2020: Prometric extended the suspension of online testing services through April 30, 2020.
- April 28, 2020: Prometric plans to resume testing for “essential services programs” during May. This includes the NGA OQ Program. Within the northeast, test center openings planned for May 1st include only NH and ME. Additional regions/states will be evaluated on a weekly basis. Prometric will reduce the number of active workstations in the testing rooms to conform with government-mandated social distancing standards. This will reduce site capacities by 50%. Facemasks must also be worn at all times for testing. Other adjustments to testing protocols will be made to help ensure the safety of all involved.
- May 7, 2020: Prometric announces plans to open Brick & Mortar test centers in CT, MA, NJ, NY, PA, and VT with target re-opening dates between 5/13 and 5/18. Preparations have begun to re-open onsite test centers within the region. For a complete list of Prometric center openings, please visit the Prometric website at https://www.prometric.com/site-openings.
- May 26, 2020: Through the month of May, Brick & Mortar center openings expanded through the northeast to include test centers in CT, MA, ME, NH, NJ, NY, PA, RI, and VT. Additional Brick & Mortar test center openings are scheduled through mid-June. LDC onsite center openings and event kit testing will lag Brick & Mortar center openings to enable Prometric to execute a resumption of services plan and to enable onsite centers to prepare for adjustments to protocols, PPE, and process flows. NGA is facilitating communications with onsite centers in an effort to bring these centers back online as soon as possible. Target re-opening dates for onsite centers are in the early to mid-June timeframe. All Prometric test centers are operating at 50% capacity due to social distancing requirements. NGA is planning for the resumption of performance evaluation services to begin in mid-June, subject to social distancing protocols, use of PPE, and other process safeguards to help ensure the safety of all involved. NGA has worked with membership and our team of Evaluators to develop COVID-19 protocols and a site preparation checklist (see accompanying document). A cooperative effort with host sites regarding these social distancing measures will be essential to the successful resumption of performance evaluations.

Background: At the close of business on March 17, 2020, Prometric and NGA temporarily suspended OQ testing services due to the COVID-19 pandemic. This included online testing at Prometric test centers and the delivery of performance evaluations by NGA. Restoration of these services will be done as soon it is determined that delivery of these services can be accomplished safely without risk to the health of all involved. NGA and Prometric will consider resuming services on a local or regional level if/when permissible in accordance with CDC and state/local guidance. That said, we expect the pent-up demand for these services to create a backlog and delay in requalification of personnel whose qualifications...
expired and/or are approaching expiration. The duration of the suspension of OQ services will directly impact the time required to requalify personnel as the backlog of those requiring requalification will grow over time.

This suspension of OQ services will impact operators and contractors differently dependent on several factors. The size of the organization, geographic footprint, access to an onsite Prometric test center, and the training/requalification cycles of each company are all contributing factors. The timeframe to requalify personnel will therefore vary for each operator and their contractors. Operators will assess the impact to the qualification of personnel and will use this information in the development of company specific OQ requalification plans and projected timeframes. NGA and Prometric will support these efforts and utilize all available resources to minimize the impact.

3-Month Grace Period: NGA reminds operators and contractors that the OQ plan includes a 3-month grace period. The specific section of the NGA plan is referenced below.

6.7 Subsequent Qualification Intervals
(b) Subsequent qualification intervals allow for a 3-month evaluation grace period, except as noted below. For example, individuals qualified on tasks with a 1-year subsequent qualification interval shall re-qualify within 1 year, but not to exceed 15 months. Individuals qualified on tasks with a 3-year subsequent qualification interval shall re-qualify within 3 years, but not to exceed 39 months.

Exception: The 3-month grace period does not apply to the welding skill assessment.

PHMSA’s Stay of Enforcement: On March 20, 2020 PHMSA issued a Notice of Stay of Enforcement and Notice of Enforcement Discretion to Operators Affected by the COVID-19 outbreak. The Notice provides a stay of enforcement on Part 192 Subpart N – Operator Qualification and Part 193 Subpart H provided operators act reasonably to ensure trained, non-impaired workers perform operations, maintenance and control-room tasks.

Extension of the Grace Period through the State of Emergency: Some operators, based on their specific circumstances, have amended their OQ plan, or are considering an amendment to their OQ plan, to allow for an extended grace period due to the COVID-19 pandemic. This is a company-by-company decision. Please check with personnel responsible for the operator’s OQ plan on this matter.

In most cases, when the grace period was extended, it was done so for all OQ covered tasks, and underlying examinations, except for welding and plastic joining skill reassessments. The following language was used by many operators to extend the OQ grace period:

6.7 (c) The grace period for requalification may be extended for the duration of a declared State of Emergency and for a reasonable period of time thereafter to requalify personnel.

Please confirm with each operator that an extension of the OQ grace period is permissible, along with any restrictions or required notifications, before relying on an extension to the 3-month grace period.

Restoration of OQ Services: NGA and Prometric are committed to resuming services as soon as possible while ensuring the health and safety of all involved. The COVID-19 situation is fluid with updated
guidance being routinely issued by the CDC, federal, state, county, and local governments. These directives will be reviewed, and decisions will be made accordingly. Prometric has resumed testing for essential services programs at the majority of their Brick & Mortar test centers during the month of May with additional site openings planned for early/mid-June, subject to local conditions and government guidance. NGA’s OQ Program falls under the “essential services program” umbrella. The following outlines the planned approach to resuming online testing and performance evaluation services:

**Online Testing Services:**

- Prometric’s Incident Management Team (IMT) is monitoring COVID-19 developments at the national, state and local levels. Decisions will be made to open centers on a regional and local level dependent on government guidance and local conditions. The timing of center openings will be communicated as decisions are made. **On 5/1/20 Prometric began opening Brick & Mortar sites in 34 states/118 markets within the United States for essential testing. Through the month of May, Brick & Mortar center openings expanded through the northeast to include test centers in CT, MA, ME, NH, NJ, NY, PA, RI, and VT. Additional Brick & Mortar test center openings are scheduled through mid-June.** Test center openings for essential services programs are being evaluated weekly and will be updated on Prometric’s website. For a complete list of Prometric center openings, please visit the Prometric website at [https://www.prometric.com/site-openings](https://www.prometric.com/site-openings)

- LDC onsite center openings and event kit testing will lag Brick & Mortar center openings to enable Prometric to execute a resumption of services plan and to enable onsite centers to prepare for adjustments to protocols, PPE, and process flows. NGA is facilitating communications with onsite centers in an effort to bring these centers back online as soon as possible. **Target re-opening dates are in the early to mid-June timeframe.**

- Site protocols and seating limitations will be adjusted in all test environments to allow sites to open while adhering to social distancing guidance. Reducing the number of active workstations in the testing room will ensure proper social distancing is maintained between each individual during test administration. **This will reduce the capacity at each location by at least 50% and will require Prometric to displace scheduled candidates at Brick & Mortar test centers.** The following is additional information regarding reduced capacity at Prometric test centers.
  - Prometric will inform impacted candidates during the week of 4/27/20 of the need to cancel their existing appointment as the result of social distancing preventative measures. The date range of the appointments that will be impacted runs from May 1st through June 30th.
  - After the candidate displacement notification has been sent, Prometric will begin processing the cancellations. If the candidate was displaced, they are to schedule a new appointment on Prometric’s website or through the Prometric bulk scheduling team. Prometric is extending hours and days to help accommodate the reduced capacity at testing centers.
  - Every 30 days, Prometric leadership will review current conditions and will determine if an extension of the social distancing measures are necessary. If that decision is made, Prometric will inform you of further candidate displacements and will inform candidates of their cancelled appointments.

- **Prometric will be requiring all candidates and proctors to wear facemasks while in the test center. Candidates must bring and wear a face covering (cloth or medical facemask) to the**
test center. Candidates will be permitted to wear latex gloves during testing. Additional adjustments to protocols will be implemented to help ensure the health and safety of all involved.

- Given the Prometric closure of test centers across the U.S. and Canada, Prometric expects the demand for services to be considerable once testing resumes. Prometric has instituted a Resumption of Services team to manage this process. This team will look to expand the hours and days of test center operations to accommodate the demand for services. Prometric’s online scheduling portal and bulk scheduling team are open for scheduling/rescheduling test sessions.
- Given the expected demand for seats at brick-and-mortar test centers, NGA recommends that capacity at LDC onsite test centers and event-kit testing provisions be utilized to the fullest extent possible. Operators are being encouraged to consider their contractors’ testing needs in their testing plans for onsite centers. NGA is reaching out to onsite test center contacts to have these discussions, review the updated testing protocols, understand the projected test day requirements for onsite centers, and to understand whether contractor testing could be accommodated by the Operator.
- NGA has reached out to those companies who have secured and utilize dedicated event-kit set-ups to determine their testing needs, locations, and tentative schedules.
- For operators and contractors with significant testing needs, who cannot be accommodated by onsite test centers or through dedicated event-kit testing, NGA will coordinate requests for the three NGA owned, portable event-kit set-ups and prioritize deployments based on the testing backlog of each company. NGA will begin outreach to prospective companies to understand interest and needs.

NGA Performance Evaluation Services:

- NGA is planning for the resumption of performance evaluation services to begin in mid-June, subject to social distancing protocols, use of PPE, and other process safeguards to help ensure the safety of all involved.
- NGA has worked with membership and our team of Evaluators to develop COVID-19 protocols and a site preparation checklist (see accompanying document). A cooperative effort with host sites regarding these social distancing measures will be essential to the successful resumption of performance evaluations.
- Host sites will be requested to review the protocols, make site adjustments as required, and complete/return the checklist to the NGA office as part of the scheduling process. Evaluators will call and review the site set up with the host site representative before the scheduled date.
- These measures will likely impact evaluation productivity, at least initially. Members should consider this when scheduling and planning for performance evaluations.
- LDCs are still encouraged to expand delivery of pipe joining practical evaluations to their contractors, if warranted, based on expiration of pipe joining practical evaluations beyond the 3-month grace period.
- When performance evaluation services resume, priority and scheduling decisions will be based on the following factors:
  - Date of the cancelled evaluation session(s)
  - Pipe joining requalification (priority) versus OQ evaluations
  - Expiration date of qualifications
  - Availability of Evaluators
NGA is taking requests for performance evaluations. We will catalog these and begin scheduling with members as soon as practical.

For any OQ related questions, please email OQ@northeastgas.org