

## Checklist

# Key Criteria for a Best Practice-Based OQ Solution

More prescriptive, best practice-based requirements for Operator Qualification (OQ) programs seem imminent. The goal is to improve program effectiveness and more fully realize the intent of the OQ Rule, “to ensure a qualified workforce and to reduce the probability and consequences of incidents caused by human error.”

Some companies proactively started incorporating anticipated new guidelines into their program. This checklist highlights some significant changes sought by federal and/or state regulators. It also identifies key criteria to require from a third-party vendor when moving towards a best practice-based OQ solution.

*Criteria denoted with an asterisk (\*) are more advanced software features and vendor capabilities that support your ability to defensibly meet proposed, more stringent OQ requirements and are only offered by top tier OQ solution vendors.*

## Covered Task List & Task Criteria

Significant changes being sought & new expectations include:

1. Broader definition of a covered task, expanding the scope of an OQ program
2. Required task training
3. Required training on operator-specific procedures and equipment
4. Documented review of accepted tasks from third-party OQ vendors to demonstrate alignment with operator's operations.

To satisfy these types of requirements, look for the following in a third-party OQ solution:

- **Operator-driven, out-of-the-box task list\*** - Any out-of-the-box, “common” task list offered by the vendor was developed, and is maintained, using a collaborative, well-documented process driven by member operators
- **Configurable task selection\*** - Vendor’s software supports the use of “common” covered tasks, operator-specific tasks, or a hybrid of both, enabling tight alignment of your task list and criteria with your company’s unique operations
- **Task training and operator-specific policy & procedure requirements\*** - Vendor’s software can tie task training and/or operator-specific policy & procedure training/acknowledgement to relevant tasks and enforce completion as a co-requisite to evaluation
- **Online covered task training** - Vendor offers a robust library of online covered task training courses that can serve as a cost-effective way to help you satisfy covered task training requirements
- **Online operator-specific policy & procedure training\*** - Vendor’s software allows you to upload and host your company’s policy & procedure documentation/training/testing materials
- **Integrated training management\*** - Vendor’s software allows you to centrally organize, assign, and deliver task and/or operator-specific policy & procedure documentation/training/testing, as well as track and provide proof of completion

## Evaluation/Qualification Protocols

Significant changes being sought & new expectations include:

1. Documentation of evaluator requirements, including selection criteria and necessary training
2. Program to measure and track evaluators' performance
3. Evaluation criteria must incorporate operator-specific procedures, equipment, and AOCs
4. Evaluation must include performance-based criteria
5. Required equivalency between employee and contractor training and evaluation processes.

To satisfy these types of requirements, look for the following in a third-party OQ solution:

- **Evaluator selection\*** - Vendor has clearly-established evaluator selection criteria and a stringent, well-documented selection process that includes a formal application and technical and character references
- **Evaluator training** - Vendor requires and provides in-depth training for evaluator candidates to ensure they are taught/understand how to properly conduct evaluations
- **Performance-based, operator-specific evaluation criteria\*** - For all "hands-on" tasks included on a vendor's out-of-the-box covered task list, both knowledge- and skills-based criteria are utilized to assess KSAs (Knowledge, Skills, and Abilities) before qualification is granted; task criteria require the evaluator to assess the individual's KSAs and ability recognize and react to AOCs using operator-approved procedures and appropriate equipment/material
- **Record of evaluation QA\*** - Vendor performs quality assurance (QA) review of records of evaluation and supporting documentation to ensure your requirements have been met before a qualification is granted
- **Evaluator audits\*** - Vendor regularly audits the performance of authorized evaluators to ensure evaluations are consistently conducted in accordance with your OQ program and appropriate procedures
- **Qualified individual audits\*** - Vendor regularly audits qualified individuals to help ensure that workers are truly qualified to perform covered tasks safely

## Span of Control (SOC)

Significant changes being sought & new expectations include:

1. Much tighter SOC limits with well-documented supporting analysis
2. Required documentation of individuals working under SOC.

To satisfy these types of requirements, look for the following in a third-party OQ solution:

- **SOC limit analysis\*** - Vendor's off-the-shelf task list is backed by a well-documented analysis of SOC limits that aligns with recognized ASME B31Q industry standards and methodologies
- **SOC documentation\*** - Vendor's software supports the ability to capture a record of individuals working under SOC

## Requalification Intervals

Significant changes being sought & new expectations include:

1. Requirements for requalification are the same as at initial qualification (including all required training)
2. Well-documented supporting analysis for requalification intervals.

To satisfy these types of requirements, look for the following in a third-party OQ solution:

- **Requalification interval analysis\*** - Vendor's off-the-shelf task list is backed by a well-documented analysis of required requalification intervals that aligns with recognized ASME B31Q industry standards and methodologies

## Management of Change (MOC)

Significant changes being sought & new expectations include:

1. Required MOC program, including MOC notification recordkeeping

To satisfy these types of requirements, look for the following in a third-party OQ solution:

- **MOC notifications\*** - Vendor's software enables notification of change to relevant parties electronically (e.g., via email and/or in-system notification) and logs all MOC notifications, including records of acknowledgement by recipients
- **MOC requirement enforcement\*** - Vendor's software enforces required action by notification recipients (e.g., completion of acknowledgement, supplemental training, re-evaluation, etc.) based upon the designated significance of the change; includes the ability to remove qualifications for changed tasks until an individual has taken required action(s)

## Recordkeeping & Program Effectiveness

Significant changes being sought & new expectations include:

1. More details required as part of individual qualification records (e.g., how was qualification determined and by whom?)
2. Required new program-level recordkeeping (e.g., MOC notifications, evaluator selection criteria, etc.)
3. A written process and tracking of metrics to measure OQ program effectiveness
4. Required annual program effectiveness review.

To satisfy these types of requirements, look for the following in a third-party OQ solution:

- **Real-time status & supporting documentation\*** - Qualification records are accessed directly from the vendor's software (not from a third-party contractor management system), ensuring the timeliness and reliability of individual records and enabling your access to supporting details (e.g. who qualified the worker?) and documentation (e.g., the completed evaluation form)
- **Comprehensive field verification\*** - Vendor's software provides reporting to verify and document an individual's task qualification(s) before they go to work, including the completion of any required task training and/or operator-specific policy & procedure acknowledgement/training
- **Program effectiveness metrics\*** - Vendor's software provides reporting on results of QA checks/audits on qualified individuals and evaluators to aid you in measuring and demonstrating OQ program effectiveness

## Other Considerations

Additional considerations when seeking a third-party OQ solution that supports OQ best practices should include:

- **OQ consulting expertise\*** - Vendor has a wealth of in-house industry experts, who bring decades of real-world experience and knowledge of key regulations and standards to help you optimize and adapt your OQ compliance program to keep pace with business or regulatory changes
- **Peer network\*** - Vendor hosts regular opportunities to learn from and share best practices with other client companies to help you drive continuous OQ program improvement
- **Comprehensive solution\*** - Vendor takes a unified solution approach that combines software with complementary audit, training, and consulting services, which maximizes the effectiveness and defensibility of your OQ program

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