

OQ and Accident/Incident Investigation

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IT HAPPENED

NOW WHAT DO YOU DO?

OR THIS MIGHT BE A GOOD
TIME OR TOPIC FOR A DRILL...

Actions

Immediate Communication of Accident/Incident

- **911**
- **Operations/Control**
- **Federal and/or state agency**

Actions

Initial Review of Facts:

- **Ask if OQ tasks were being or had been performed**
- **Could anyone's performance of the covered task have contributed to the accident or incident – if yes...**
 - **Ensure OQ Manager/Coordinator is notified and determine the immediate actions taken with the individual(s)**

Things to Know

- **Consider suspending the individual(s) from performing the covered task(s) that may have contributed to the accident/incident until the investigation is completed.**
- **His or her performance of that covered task while the investigation is being completed could compromise another part of your system.**

Things to Remember

- **Document that you have made a determination**
- **Drug and alcohol testing needs to be considered if no determination can be made that the individual(s) did not contribute to the accident/incident**
- **Be prepared to provide documentation of your decisions on OQ and D&A**

Enforcement Guidance

§ 192.805(d), § 195.505(d)

Each operator shall have and follow a written qualification program. The program shall include provisions to:

(d) Evaluate an individual if the operator has reason to believe that the individual's performance of a covered task contributed to an incident or accident as defined in Part 192/195;

Examples of a Probable Violation or Inadequate Procedures

- 1. The written operator qualification program does not include a requirement to immediately suspend an individual's qualifications to perform a specific covered task if there is reason to believe the individual may have contributed to an incident or accident while performing the task, pending the outcome the investigation.**
- 2. There was no review of the individual's performance to determine if the individual's performance of a covered task led to a near miss or accident (DOT-reportable or non- DOT reportable).**

Examples of a Probable Violation or Inadequate Procedures

- 3. An individual performs a covered task while under investigation post incident or accident review.**
- 4. The operator did not immediately suspend an individual's qualifications to perform a specific covered task when there was reason to believe the individual may have contributed to an incident or accident while performing the task, pending the outcome of the investigation.**

INSIDE THE ISSUES

- **Procedure**
- **Material**
- **Training**
- **Qualification/Evaluation**

PROCEDURES

- **Review what work was being performed**
- **Determine if the correct procedure was being utilized for the task**
- **Determine if the procedure was followed**

MATERIALS

- **Although it may take an in-depth lab evaluation, material failure could be the cause**
- **Determine if the correct materials were used initially in construction**
- **Was replacement correct**

TRAINING

- **Determine if training had been provided for the covered task being performed**
- **Determine if the training was adequate**
- **Determine if the training was timely**
- **Did the individual encounter an issue that training did not address?**

EVALUATION/QUALIFICATION

- **Determine if qualification(s) are current for individuals performing covered task(s), including recognizing and reacting to AOCs**
- **Determine type of evaluation(s) for the covered task(s)**

EVALUATION/QUALIFICATION

- **Determine if the evaluation adequately addressed the covered task**
- **Determine if the evaluation occurred as documented**
- **Determine if the AOCs addressed in the OQ plan are reasonable**
- **Determine the evaluator**
- **Determine if the evaluation was performed correctly**

DO A FOLLOW UP

- **Take a OQ field inspection form (PHMSA #15) to ensure that other individuals are able to perform the covered task**
- **If others are not performing the covered task correctly, there may be issues with evaluation methodology, O&M procedures, training or the evaluator.**

§ 192.805(f), § 195.505(f)

Each operator shall have and follow a written qualification program. The program shall include provisions to:

- **(f) Communicate changes that affect covered tasks to individuals performing those covered tasks;**

Things to Know

After the investigation, develop a plan of action, implement the action, and have all areas of your operation in the communication loop:

- **OQ - Company and contractor employees**
- **Procedures (O&M)**
- **Training**
- **Contracts (possible)**

Things to Know

Close the Loop!

- **Communicate to all affected groups and individuals**
- **Take action so that it will not occur again**
- **Ensure changes have been implemented**
- **Check records**

QUESTIONS?



Thank You!

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