

Remote Evaluations

MEA GUIDANCE ON CONDUCTING REMOTE EVALUATIONS

COVID-19 and the OQ Rule

COVID-19 has created a National Emergency that has affected all aspects of our life, including how we manage the OQ Rule. The unprecedented risks involved with catching COVID-19 have mandated changes in how we conduct training and evaluations. Travel restrictions and social distancing measures are now the norms, making it increasingly difficult to conduct in-person performance evaluations.

In a **March 20, 2020 Notice**, **PHMSA recognized the challenges created by COVID-19**. The PHMSA Notice offered discretion during these times, including temporary relief of the rules and a moratorium on enforcement actions. During this period, PHMSA strongly suggests that:

“...operators who are unable to comply with these regulations should maintain documentation explaining what specific requirements are not being met, how the non-compliance is related to COVID-19, and what alternative measures are being taken to ensure safety. Operators should also communicate with their regulator as indicated in this notice.”

Remote Evaluations

MEA has been asked by members and EnergyU subscribers if we approve or support remote evaluations. **Yes, MEA can support remote evaluations.** The most important requirement is that you **DOCUMENT** any changes made to enable the evaluation to be conducted remotely.

Here are the steps we recommend that you follow:

1. The MEA Evaluator shall enter extensive notes pertaining to the remote process in the first comment section of the evaluation form used. (If using EnergyU Evaluations (formerly, EZval), enter this information under Question #1.) Full documentation is important and needs to include:
 - a) Name/ type of communication devices used (e.g., FaceTime, Skype, Zoom)
 - b) Verification that audio and video quality are tested and working prior to the start of the skills assessment.
2. A simulated testing environment is recommended to eliminate the chance for an Abnormal Operating Condition (AOC) to occur.
3. Make introductions. The MEA Evaluator should give a brief introduction to the individual being evaluated to include how the OQ regulation affects both the industry and individuals, and the purpose for the evaluation.
4. Review instructions and expectations. Instructions shall include a review of the requirements for a remote evaluation.
5. Ensure no other individuals are assisting the candidate during the evaluation. If a second person is needed to hold the camera, microphone, etc., they cannot speak, or in any way assist the individual being evaluated. Obtain verbal confirmation that any person(s) supporting the remote evaluation process understand this condition.
6. Perform evaluation in accordance with the MEA Performance Evaluation form.

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- a) Follow the Performance Evaluation Form step-by-step and complete the form in its entirety.
 - b) For each step, document how that particular step is being conducted remotely.
 - c) Taking videos/photos is recommended, as it will provide proof on the identity of the individual being evaluated and how the process is being implemented.
7. Upon completion, provide results and identify next steps to the candidate.
 8. The MEA Evaluator is allowed to sign for the candidate in the acknowledgement statements section of the MEA Performance Evaluation form.

IMPORTANT! Documentation is critical for remote evaluations. Review the evaluation form for completeness to ensure that it covers the changes made as a result of the remote method used.

9. Once a thorough review is completed, ensure appropriate transmission of records.
10. All other evaluator procedures required by the operator must be followed:
 - a) Verify that the individual has access to and uses the appropriate reference materials during the evaluation (e.g., procedures, standards).
 - b) Evaluations shall always be performed 1:1.
 - c) If an individual fails the evaluation, do not attempt to qualify again until the required review period has been reached.
 - d) Follow all changes made by the operator as it relates to remote evaluations. The operator's requirements supersede MEA's recommendations as outlined in this document.

It is important to remember that while MEA supports Remote Evaluations it is with a clear understanding that changes within the Operator's OQ Plan are decided by the operator and its regulators—not the OQ provider. It is the operator who will need to decide if remote evaluations are acceptable. If it is the operator's decision to move forward with remote evaluations, then they need to document the changes to their OQ Plan and inform the regulators of these changes.