

# Gas Operator Qualification Membership (Updated February 6, 2024) Process & Frequently Asked Questions

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## PROCESS

### Step 1:

Licensee (employer firm) applies for membership in the Plumbing Foundation's Gas Operator Qualification program. Licensee essentially "sponsors" qualified employees (and the licensee him/herself) seeking to obtain Operator Qualification (OQ) in Covered Tasks 86/87. The cost is an annual flat fee per person. There may be additional costs associated with training, but which are not charged by the Plumbing Foundation. Other additional costs such as for re-testing and renewal exams will be billed by the Plumbing Foundation separately.

### Step 2:

All seeking OQ must pass a pre-employment drug test which will be coordinated by Clarity Testing through the Plumbing Foundation.

### Step 3:

Obtain required 7-hour OQ training AND take the online "refresher" training, more information below. The Foundation will coordinate the scheduling of the 7-hour OQ training.

### Step 4:

Pass the written examinations and practical examination, more information below. The Foundation will coordinate the scheduling of the OQ exams.

### Step 5:

After successfully completing steps 1-4, successful candidates will be issued a QR card. Provided that the qualified person **maintains employment with an active NYC licensed master plumber**, and they follow all requirements of membership in the Plumbing Foundation OQ program, they will be permitted to do this work.

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**Note: This membership is available for NYC Licensed Master Plumbers and their qualified employees only.**

## **FREQUENTLY ASKED QUESTIONS**

All persons interested in obtaining Operator Qualification for Task 86 (inspections of USDOT jurisdictional gas piping) and Task 87 (repairs/maintenance of USDOT jurisdictional gas piping) should understand all requirements necessary to achieve this status. We have assembled a list of frequently asked questions. If after reading this section, you still have additional questions, please contact us via email at **GOQmembership@plumbingfoundation.nyc**. **Please do not call the office. All calls related to OQ questions will be referred to the website.** If you email us regarding a question, please reference the page number of this document and the specific question number. We have done our best to make this list as inclusive as possible, but we realize that there may be some issues that have not been identified. We will make changes to this section as required, which will be updated on an ongoing basis and published on the Plumbing Foundation's website at: **<https://www.plumbingfoundation.nyc/gas-operator-qualification>**. Please ensure that you are viewing the most updated version. Questions emailed shall be responded to as soon as possible. If necessary, someone from our office will contact you directly.

1. **What is *USDOT jurisdictional gas piping*?** As used in the Gas Operator Qualification membership application, documents, and explanatory materials, "USDOT" or "DOT jurisdictional gas piping" is defined as all visibly accessible interior building piping, fittings, and appurtenances (meters, pressure regulators, filters, meter bars, and transition piping) regulated by the federal Department of Transportation (DOT) from the point of entry (POE/wall penetration) through the outlet of the meter. This definition is from the Northeast Gas Association's (NGA) Operator Qualification Covered Task List. **Note:** For exterior building piping, both exposed and buried piping, NYS has extended the definition of DOT Jurisdictional Gas Piping to include piping from the outlet of the meter to where the piping enters the building.

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## 2. What are Covered Tasks 86 and 87?

- a. Covered Task 86 (Conducting Interior Jurisdictional Piping Safety Inspections): Conduct interior jurisdictional piping safety inspections, including identification of abnormal operating conditions (AOCs), inspecting for atmospheric corrosion, and performing leak surveys. This description is from NGA's Operator Qualification Covered Task List.
- b. Covered Task 87 (Conducting Interior Jurisdictional Piping Construction and Maintenance Activities): Interior jurisdictional piping construction and maintenance activities conducted (in NYC) by operator-qualified Licensed Master Plumbers (LMPS), operator-qualified technicians working under LMPs, or operator-qualified utility personnel. This description is from NGA's Operator Qualification Covered Task List.

3. **I am an NYC licensed master plumber. Am I exempt from this training?** NO, if the LMP performs work covered by Tasks 86 and/or 87, he/she must be OQ'd and part of a drug and alcohol program compliant with the U.S. Department of Transportation (USDOT) Pipeline and Hazardous Materials Safety Administration (PHMSA). The LMP still needs all completed paperwork (including Attachment C) to be considered for the program.

4. **What experience does my employee need to participate in this program?** The training provided for this particular operator qualification is specialized enhanced safety training. Task 87 Candidates will be required to have prior knowledge of fuel gas pipe system repair, installation, and maintenance. The training for this task is limited to the specific requirements listed. Task 86 training will include performing leak surveys, corrosion surveys, recognizing and responding to abnormal operating conditions, and purging gas piping systems in and out of service. All candidates are expected to have a familiarity with gas operations. As the licensee you will be sponsoring the candidate and attesting to their experience level and employment with your firm. If it is discovered any false statements or fraudulent information has been provided, your firm may be dropped from the program. In addition, you will be reported to the NYC Department of Buildings. **UPDATE AS OF DECEMBER 18, 2023:** Due to regulatory changes by the NYS Department of Public Service requiring practical

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exams for all tasks, the Northeast Gas Association has revised the task sheet for 86/87 to include an experience requirement for Task 87 in lieu of a practical examination (the practical exam for 86 is still in place). That revision requires that ANYONE with an operator qualification in CT86/87 MUST have at least 5 years of experience. This went into effect as of December 18, 2023. See task sheet [here](#). NOTE: If you have an active OQ in 86/87 as of Dec. 18, 2023, this experience requirement will ONLY be required when you are up for renewal. Anyone new to the program will need to provide experience (see ATTACHMENT F on our [website](#)) before the 7-hour training. To prove your experience, the following will be requested:

- a. A copy of a valid NYC Department of Buildings (DOB) issued Master Plumber License; OR
  - b. A valid NYC DOB issued Journeyman Plumber Card; OR
  - c. A valid NYC DOB issued Full Gas Qualification Card; OR
  - d. This [affidavit](#) from the LMP employer that such person has at least 5 years of experience.
5. **Can I only have a journeyman (mechanic) certified and send a non-operator qualified helper with them?** No. Anyone working on Task 86 or Task 87 must hold the Operator Qualification.
6. **How do I obtain qualifications for myself or my employees?** Complete the application and all attachments available on [our website](#). We STRONGLY urge you use the checklist to ensure you follow instructions.
7. **Do I have to be a full member of the Plumbing Foundation?** No, the GOQ membership is a separate membership specifically for obtaining operator qualification in Tasks 86 and 87 and is open to the entire industry. However, if interested, please contact the Plumbing Foundation at [info@plumbingfoundation.nyc](mailto:info@plumbingfoundation.nyc) to receive the application for full membership.
8. **Can I sign up my company now and only complete Attachment A and sign up my employees at a later date?** No. All applications for GOQ membership into the Plumbing Foundation must include at least one participant. Subsequent

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participants can be added by submitting Attachments B and C for additional employees.

9. **Why do I need Attachment B?** Participation in this program requires compliance with PHMSA drug and alcohol testing requirements as listed in 49 CFR Part 199 and 40. The template in Attachment B meets those requirements.
10. **Who should be the Designated Employee Representative for the purpose of receiving the drug and alcohol test results?** The DER is chosen within your discretion but is sometimes the person that handles the human resources aspect of your company.
11. **Why am I providing a credit card authorization to the drug and alcohol testing provider (Attachment E)?** This is required in the event that post-accident testing is required. Pre-employment and random testing are included in the flat annual membership fee.
12. **Is the price of membership \$725+ per person every year?** No, the price in the application (subject to change) refers to the FIRST YEAR of membership when employees are taking the OQ training and exams. Once an employee is OQ'd, the annual fee per OQ'd person is \$400 (subject to change) to cover the ongoing drug and alcohol testing pool and related administrative fees. The Plumbing Foundation does reserve the right to modify these costs as per the application signed to by the licensee. In addition, retesting fees after your OQ status expires in three years will be billed separately. Also billed separately are fees associated with makeup exams and card replacements.
13. **What is included in the price per person for membership?** Price as listed in the application per person includes (i) coordination of training; (ii) full cost and coordination of first time taking OQ test in Tasks 86/87; (iii) cost and coordination of pre-employment drug test; (iv) cost of random drug testing pool; and (v) other related/necessary expenses such as the ITS database and GTI field skills license.

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14. **What is NOT included in the price per person for membership?** There *may* be additional costs associated with the authorized instructors. For example, the Master Plumbers Council will be charging a fee for training of any non-union firm. In addition, if there is an accident on a job site and post-accident drug and alcohol testing is required, that cost will be directly charged to the plumbing firm. Finally, costs associated with renewal exams, makeup exams, and card replacements are billed separately.
15. **What type of drug test must the participant pass?** The participant will be subject to a seven-panel drug test compliant with PHMSA requirements.
16. **When am I subject to drug and alcohol testing?** As stated, each participant must take a pre-employment drug test and pass such drug test to then be scheduled for OQ exams. Participants are then subject to random drug testing once placed in the pool, 50%\* of such pool is subject to random drug testing on an annual basis (per US DOT regulations). The other times participants *may* be subject to drug and alcohol testing is post-accident on the job site and/or reasonable suspicion, both of which are defined in the Employer's drug plan (Attachment B). \*For 2023, PHMSA lowered the testing rate to 25% of the pool but this is subject to change per PHMSA rules and regulations.
17. **When and how do I take the pre-employment drug test?** After your application has been processed, your information will be sent to Clarity Testing, the provider that will be coordinating the test with your DER. Clarity will then mail the company a chain of custody form to be taken to a lab for the drug test.
18. **What happens if the participant passes the pre-employment drug test?** Participants that pass their drug tests will move on to the next step. **We reach out to all participants directly via email when they are eligible to move on to the next step in the program – no need to call/email us. And NEVER send us drug test results directly.**
19. **What happens if the participant fails the pre-employment drug test?** Participants that fail the pre-employment drug test will not be permitted to move on to the next step. To obtain operator qualified status, they must pass a second

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pre-employment drug test at an additional cost. If the member firm wishes to withdraw the employee from the GOQ program, they will be refunded a portion of their membership fees. *Note: The Plumbing Foundation does not enter into employment or collective bargaining agreements with any employees. If the participant fails the pre-employment drug test, any further action taken by the employer is between the employer and the employee.*

20. **How do I obtain training?** Members of Plumbers Union Local #1 and their employees shall be trained by certified instructors at the Local #1 Training Center. After such 7-hour training, participants will also be required to take the online refresher training at least 48 hours prior to their scheduled written exam. The Plumbing Foundation will be working with Local #1 Training Center to schedule such training. *Note: Local #1 members will only receive training after their employer has applied to the Plumbing Foundation's Gas Operator Qualification program then after member passes the drug test and member is approved by the funds office.* For all other licensees seeking to obtain training for themselves or their employees, training will be provided by the NYC Master Plumbers Council (MPC). The Plumbing Foundation will be working with MPC to schedule training. **You must be a GOQ member and complete the drug test FIRST.**
21. **Why do I have to take an online refresher training if I took the 7-hour training?** The Gas Working Group comprised of the utility companies, NGA, and plumbing associations agreed it would be beneficial to require all participants, regardless of taking the written exam the first time or renewing their OQ card, to take the online refresher training at least 48 hours prior to their scheduled written exam.
22. **How does a candidate get an appointment to take the written and practical exams?** A participant in the Plumbing Foundation GOQ program that has passed a pre-employment drug test and obtained the required training (i.e. a Certificate of Completion) shall be contacted by our office via email with links to register for an exam.

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23. **What if the test date offered does not work for the participant?** When the participant receives the exam date and they are unable to attend they must wait for a new email with new dates to register. **The cut off to cancel an exam registration is seven (7) calendar days before the exam date.** The Plumbing Foundation will allow for schedule changes up to three times without an additional charge. After that, an additional fee of \$100 (subject to change) will be charged for changing a scheduled test date to accommodate that participant.
24. **What if the candidate does not show up for the exam?** Candidates that fail to show up for an exam or cancel after the cut off time will be charged a **\$325 (subject to change) no show fee, no exceptions.**
25. **What is the examination process?** Each technically qualified participant (as referred by the LMP) successfully completing the 7-hour Interior Gas Piping Safety Inspection and Connections Training Program **MUST** complete, in addition to a practical exam, three written exams including:
- Task 86/87 Test A - Jurisdictional Piping General Knowledge (44 questions)
  - Task 86 Test B - Interior Jurisdictional Piping Safety Inspections (20 questions)
  - Task 87 Test B - Conducting Interior Jurisdictional Piping Construction and Maintenance Activities (44 questions)

**NOTE:** There is a mandatory 48 hour wait period between training and testing

In addition to the computer-based knowledge exams highlighted above, each participant must successfully complete a Practical Exam (PE) where the participant demonstrates the skill and ability to apply core fundamental knowledge. The PE is a series of simulated situations that the participant may experience while conducting interior gas piping safety inspections. Each participant must pass each written exam with a score of 80% or better to achieve Operator Qualification for conducting interior gas piping safety inspections and making jurisdictional piping connections (3 Knowledge Exams & Practical Exam). The practical exam is pass/fail.

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## Failure of a Qualification Exam

If an individual does not pass a qualification exam, the individual shall be considered non-qualified and prevented for 48 hours from retaking the same exam.

If an individual does not pass a qualification exam for a third consecutive time, the individual shall be considered non-qualified and prevented from retaking that exam for a period of 6 months. The participant **MUST** repeat the 7-hour training course prior to re-testing.

**-- PLEASE NOTE A RECENT NGA RULE CHANGE WHICH REQUIRES ALL TASK COMPONENTS (ALL PORTIONS OF THE EXAM) TO BE COMPLETED WITHIN A 36-MONTH PERIOD, MEANING ONCE YOU TAKE THE EXAMS A FIRST TIME AND NEED TO RETEST ANY PORTION YOU MUST COMPLETE ALL PORTIONS WITHIN 36 MONTHS. THE "THREE CHANCES" RULE STILL APPLIES EVEN IF YOUR SECOND/THIRD ATTEMPT IS BEYOND THE 36-MONTHS AND YOU ARE FORCED TO RETAKE ALL PORTIONS AGAIN. -**

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**Makeup exams cost a fee, billed to the company post the makeup exam.**

**NOTE:** A participant **ONLY** needs to re-test in the exam(s) they initially did not pass with a score of 80% or better.

26. **What is the "QR card"?** The QR card is a scannable, photo ID card that contains both the person's OQ status and status in the random drug and alcohol testing pool. Officials scanning the bar code on the QR card will be able to verify that the person presenting the card is the actual qualified operator and is working for the LMP of record.

27. **Does my OQ status ever expire?** Yes, OQ'd participants have to take an online refresher course every 3 years. **The cost of this refresher course only is included in your annual membership fee.** As mentioned earlier, all participants will be in the ITS database which will contain the date of expiration.

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The online refresher training, the 3-part written exam, and the practical exam are all required for renewal of the OQ card. The cost of the written and practical exams will be invoiced by the Plumbing Foundation separate from annual renewal fees.

28. **What happens if an official shows up on a job and the operator does not have their QR card with them?** If the Official asks for the QR card and it cannot be provided, the work will be stopped. For gas meter sets and swing over work, the utility crew will leave the site. The customer may be subjected to an additional fee for the utility to return. ***Make sure you have your QR card!***
29. **What happens if I lose my QR card?** You must notify the Plumbing Foundation immediately. You will be subject to a lost card fee which will vary based on your shipment choice.
30. **What if someone else uses my card?** If an unauthorized person is found to be in possession of a QR card that is not his/her card, the card shall be confiscated and both persons shall be reported to the Utility Companies and the NYC Department of Buildings. The owner of the QR card, if not already reported that card lost or stolen, will be removed from the GOQ program.
31. **Does my OQ status automatically qualify me under Local Laws 150 and 152?** Not for LL 150 (DOB gas qualification) but see # 36 below as well as our [FAQ's on LL152](#).
32. **What are the continuing requirements of membership for the Employer/LMP?** As the LMP and employer, you must be current in the GOQ membership and up to date on all membership fees. All OQ participants must be active in the drug and alcohol testing pool. Employers are required to give **written notice within 24 hours** if an employee is no longer in their employ. Employers are responsible for that employee unless the Foundation is made aware in writing of the termination of employment. LMPs are required to give **written notice within 24 hours** if LMP's NYC DOB-issued license has been suspended or revoked. **Your license must be active and in good standing to participate in this program.** In addition, employers are required to maintain the

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drug and alcohol plan (template is in Attachment B) and ensure they are in compliance with PHMSA at all times.

- 33. What are the continuing requirements of membership for the Employees/Participants?** Participants must be employed by an NYC-licensed master plumber who is a member in the Plumbing Foundation's GOQ program. Participants must comply with all aspects of the drug and alcohol program and must complete the online OQ refresher course and written exam every three years to maintain the active status of their QR card (requirement for practical exam is TBD at this time). Costs associated with retaking the exam will be invoiced separately from the membership fee.
- 34. What if someone who is not otherwise an LMP themselves but is operator qualified leaves employment of one GOQ member company to another GOQ member company?** When a participant moves from one GOQ member company to another GOQ member company, in the interest of fairness, that person's annual fee for that particular year will be prorated so that the initial company (the "old" company) doesn't invest in an employee who then jumps ship. The "new" company will have to pay the prorated fee for that person's annual membership cost which we base on a quarterly amount. The "old" company is refunded that same amount. For example (all fees in example subject to change), if someone changed companies in May (for whom the old company paid the \$400 annual renewal fee) the new company would have to pay \$300, which gets refunded to the old company. (If it was a \$725 first time participant cost, the new company would pay \$543.75). If that person was removed from the program by the old company well in advance but not more than 30 days and a \$400 fee was refunded, we would need the full \$400 paid by the new company. Be aware that once a person is removed from a company, they are removed from the random drug and alcohol testing pool, even if they had already taken the baseline drug test, therefore they are required to retake another baseline drug test under the new employer and that is an additional fee of \$100. **What if the operator qualified participant works for a new company that is *not* a GOQ member?** In order for that person to be re-activated as operator qualified, that new company would have to submit a new application to become a GOQ member company.

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35. **I have an existing GOQ membership for my company, but I wanted to add new employees, how can I do that?** If you have an existing GOQ membership for your company, you only need to send a completed Attachment B (signed, send us page 25) and Attachment C for the new employee—**do not skip steps 6 and 7**. If applicable to the participant, also send Attachment F. You can find these attachments on our [website](#). However, if any information has changed, including licensee information, address, etc. we do need that in writing so please use the application documents to update that information. REMEMBER – participants need to be licensed master plumbers or directly and actively working for a licensed master plumber.

36. **What is Attachment F? UPDATE AS OF DEC. 18, 2023:** Due to regulatory changes by the NYS Department of Public Service requiring practical exams for all tasks, the Northeast Gas Association has revised the task sheet for 86/87 to include an experience requirement for Task 87 in lieu of a practical examination (the practical exam for 86 is still in place). That revision requires that ANYONE with an operator qualification in CT86/87 MUST have at least 5 years of experience. This went into effect as of December 18, 2023. See task sheet [here](#). NOTE: If you have an active OQ in 86/87 as of Dec. 18, 2023, this experience requirement will ONLY be required when you are up for renewal. Anyone new to the program will need to provide experience (see ATTACHMENT F on our [website](#)) before the 7-hour training. To prove your experience, the following will be requested:

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- b. A valid NYC DOB issued Journeyman Plumber Card; OR
- c. A valid NYC DOB issued Full Gas Qualification Card; OR
- d. This [affidavit](#) from the LMP employer that such person has at least 5 years of experience.

As a reminder, NYC Local Law 152 of 2016 requires periodic inspections of building gas piping by licensed master plumbers and those working under the direct and continuing supervision of licensed master plumbers who have at least 5 years of full-time work experience under an LMP and who have taken a 7-hour training course approved by the DOB. LMPs themselves are exempt from LL152

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additional training requirements. *This is NOT related to LL150 DOB gas work qualification. See our flowchart on the FAQs [webpage](#) for more clarification. Attachment F (updated Feb. 6, 2024) will now allow us to record the new OQ experience requirement AND LL152 experience requirement in OnBoard.*

Further background on LL152 - The Plumbing Foundation's Gas Operator Qualification Membership Program, which provides the NGA/ GTI operator qualification in Covered Tasks 86 and 87, has been approved by DOB for the LL152 7-hour training requirement. Note that DOB does not require drug testing for LL152, but it is a mandatory part of the GOQ program so there is no way around that - our GOQ program still requires the drug test, 7-hour training, and written/practical exams. Please note that DOB does require, however, to be a qualified gas system inspector under LL152, for the person to have 5 years of full-time experience in plumbing work under an LMP.

37. **How do I renew my OQ card?** The Plumbing Foundation will email you a detailed instructional document to renew your operator qualification. The operator qualification in Covered Tasks 86/87 expires after 3 years (based on the earliest exam date expiration), so if you became operated qualified in:
- 2021 then your 3-year renewal date is in 2024
  - 2022 then your 3-year renewal date is in 2025
  - 2023 then your 3-year renewal date is in 2026

Your expiration date is the date of your first passage of any one of the 4-part exam process (3 Written Exam components and Practical Exam). EXAMPLE: John Smith passed WE 86 and 87 and PE 87 on 9/1/2018 but failed WE 86/87 that date, but passed WE 86/87 on 9/8/2018, therefore his overall expiration date is still 9/1/2021.

You will be required to follow several steps to complete the OQ renewal:

1. Refresher Training
  - a. Mandatory Online training (MUST be taken at least 48 hours PRIOR to testing or you will be locked out of the exam)
  - b. In-Person 4-hour Refresher (optional, but highly recommended)

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2. Retaking and passing all 3 parts of the Written Exam, which include:
  - a. NGA-WE-86-Interior Jurisdictional Piping Safety Inspections - (Plumbers Version)
  - b. NGA-WE-86/87-Jurisdictional Piping: General Knowledge - (Plumbers Version)
  - c. NGA-WE-87-Interior Jurisdictional Piping Construction and Maintenance Activities - (Plumbers Version)
3. Retaking and passing the Practical Exam
  - a. UA Local No. 1 Signatory Companies will have participants take the practical exam at Trade Ed
  - b. Non-union participants will take the practical exam at the Master Plumbers Council office

**38. How far in advance can I retake my OQ exams to renew my card?** You can begin retaking the exams as early as 6 months prior to your expiration date. *Note: If you allow your Operator Qualification in Covered Tasks 86 and 87 to lapse for more than 2 years/24 months, you will be required to retake the entire 7-hour training before taking all exams. Please note that the lapsing of your OQ status is separate from your required participation in the US DOT PHMSA compliant Drug and Alcohol Testing Pool, which requires that if you leave the GOQ program (i.e. the drug testing pool) for more than 30 days you must retake the baseline drug test to re-enter the drug testing pool and pay associated fees.*

**39. What happens if I fail my renewal exam?** If you begin retaking the exams and fail ANY portion, your operator qualification card is **no longer valid beginning on the date of that failure**. As was the case for original operator qualification, if you fail 3 times, you are prohibited from retaking the exams for a period of 6 months. After 6 months you must take the full 7-hour training and all portions of the written/practical exams to become reinstated.

**40. Do I have to pay for my renewal exams?** Yes. The cost of the renewal exams IS NOT included in the annual GOQ membership fee you paid the Plumbing Foundation. The cost of the exams will be invoiced to you separately by the Plumbing Foundation.

**DISCLAIMER:** Please be aware that the information provided for in this document is intended to be used for guidance and is not a legal opinion. The Plumbing Foundation cannot offer legal advice and strongly recommends you consult with your attorney if unclear about any requirements under the U.S. Department of Transportation (DOT) or NYS Department of Public Service (DPS) for operator qualification and drug and alcohol testing. Program policies and rules are subject to change over time based on the NYS DPS and/or the Northeast Gas Association's rules and regulations.