

March 1, 1990

Mr. A. E. Gettler  
The General Contractors Association  
of New York, Inc.  
60 East 42nd Street  
New York, NY 10165

Dear Mr. Gettler:

Your recent letter asks three questions about supervisory training under the employee assistance program requirements of 49 CFR Part 199.

**Question 1.** Is there a set curriculum that this 60 minute training session must follow?

**Answer.** Any curriculum may be used as long as the training objectives are met.

**Question 2.** Does the person who is giving the course have to be certified in any way?

**Answer.** Part 199 does not require that trainers be certified.

**Question 3.** What type of records need to be kept in order to verify that a person has taken the course?

**Answer.** Under ? 199.23 operators must keep for at least 3 years records confirming that supervisors and employees have been trained as required. Part 199 does not prescribe the form or style of records to be kept.

Sincerely

George W. Tenley, Jr.  
Director  
Office of Pipeline safety