



# Memorandum

Subject: **ACTION:** Approval of Alternate Bridge  
Inspection Training Courses

Date: September 6, 2022  
In Reply Refer To: HIBS-40

From: Joseph L. Hartmann, Ph.D., P.E.  
Director, Office of Bridges and Structures

To: Division Administrators  
Federal Lands Highway Division Directors

An update to 23 CFR part 650 Subpart C, National Bridge Inspection Standards (NBIS), was published on May 6, 2022. Section 650.309(h)(1) identifies the National Highway Institute (NHI) as an acceptable source of bridge inspection training courses. State transportation departments, Federal agencies, and Tribal governments (herein collectively referred to as “Agencies”) may develop alternate training, per Section 650.309(h)(2), in lieu of using the specified NHI courses.

The attached guidance outlines the criteria and process for Agencies to fulfill the requirements of 23 CFR 650.309 if they choose to utilize alternate bridge inspection training courses.

In accordance with Section 650.309(h)(3), by June 6, 2024, all Agencies with FHWA-approved alternate training under prior regulations must review and update training materials to meet the requirements of Section 650.309(h)(2), and resubmit for FHWA approval. No action is required if the course will not be used to meet the NBIS requirements after June 6, 2024.

Please share this memorandum and its attachment with appropriate staff and with all appropriate Agency officials. Questions on the guidance can be directed to Samantha Lubkin at (202) 366-1575 or [Samantha.Lubkin@dot.gov](mailto:Samantha.Lubkin@dot.gov), or to Thomas Drda at (919) 747-7011 or [Thomas.Drda@dot.gov](mailto:Thomas.Drda@dot.gov).

cc:

Directors of Field Services  
Director of Technical Services  
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# **Guidance for FHWA Review and Approval of NBIS Alternate Bridge Inspection Training Courses**

*Except for any statutes and regulations cited, the contents of this document do not have the force and effect of law and are not meant to bind States, Federal agencies, Tribal governments, or the public in any way. This document is intended only to provide clarity regarding existing requirements under the law or agency policies.*

- 1. What is the purpose of this guidance?** This guidance clarifies the requirements for alternate bridge inspection training courses as outlined in 23 CFR 650.309(h) and establishes a general framework and process for the Federal Highway Administration’s (FHWA) review and approval of those courses.
- 2. Is this new FHWA guidance?** Yes.
- 3. What authorities govern this guidance?**
  - a. Section 144(h) of title 23, United States Code (U.S.C.), National bridge and tunnel inspection standards
  - b. 23 CFR part 650, Subpart C, National Bridge Inspection Standards (NBIS)
- 4. What is the background of this guidance?** Alternate bridge inspection training was permitted under the prior regulation, with additional guidance offered in the preamble for that regulation. The updated regulation explicitly defines the requirements for alternate training in Section 650.309(h). This guidance clarifies the course requirements and the process for FHWA approval of Agency-developed courses.
- 5. What is FHWA’s guidance concerning the review and approval of NBIS alternate bridge inspection training courses?**
  - a. The NBIS provides two options for acceptable bridge inspection training to meet the minimum qualifications for bridge inspection program personnel. These options allow flexibility while also ensuring consistency in delivery of bridge inspection training courses nationally. The first option is to complete National Highway Institute (NHI) training courses covering topics identified in 23 CFR 650.309(h)(1). These courses include the following:
    - (1) FHWA–NHI–130053 Bridge Inspection Refresher Training
    - (2) FHWA–NHI–130055 Safety Inspection of In-Service Bridges
    - (3) FHWA–NHI–130056 Safety Inspection of In-Service Bridges for Professional Engineers
    - (4) FHWA–NHI–130078 Bridge Inspection Techniques for Nonredundant Steel Tension Members, formerly Fracture Critical Inspection Techniques for Steel Bridges
    - (5) FHWA–NHI–130091 Underwater Bridge Inspection

The second option allows State transportation departments, Federal agencies, and Tribal governments (herein collectively referred to as “Agencies”) to develop alternate training courses that include the topics outlined in Section 650.309(h)(1) and are consistent with the related content provided in the NHI training (23 CFR 650.309(h)(2)). The NBIS requires that alternate training materials and end-of-course assessments be submitted to FHWA for approval (23 CFR

650.309(h)(2)) to ensure national consistency for certification purposes. Agencies may submit to FHWA for review and approval training that is alternate to any of the NHI courses listed above.

- b. Alternate training courses must be reviewed by the Agency's program manager every five years, at a minimum, to ensure the material is current. Updates and changes to approved course materials and end-of-course assessments must be resubmitted to FHWA for review and approval (23 CFR 650.309(h)(2)).
- c. Agencies that have alternate training courses approved by FHWA under prior regulations must review and update the course materials to satisfy the requirements of Section 650.309(h)(1) and resubmit to FHWA for review and approval by June 6, 2024, if they wish to continue use of the alternate course (23 CFR 650.309(h)(3)). Agencies may have the need to train personnel after the effective date of the final rule and before they are able to fully revise prior-approved materials and obtain FHWA approval. In this case, it is acceptable to use existing FHWA-approved alternate training during the 24-month transition period. No action is required if the course will not be used to meet the NBIS requirements after June 6, 2024.
- d. In accordance with Section 650.309(h)(2), submission of alternate training courses to FHWA for review and approval is limited to Agencies as defined herein. Requests for approval of alternate training should be conveyed to FHWA through the appropriate FHWA Division office or FHWA Federal Lands Highway Division office (herein collectively referred to as "Division").
- e. Alternate training courses must include all the topics described in Section 650.309(h)(1) and be consistent with the related content provided in the NHI training (23 CFR 650.309(h)(2)). At a minimum, course materials should include the following:
  - (1) Course agenda, including times allotted for each topic
  - (2) Presentation materials (e.g., slides)
  - (3) Instructor guide
  - (4) Participant workbook
  - (5) End-of-course assessment
- f. Upon request, FHWA will make appropriate NHI course materials available to Agencies through a formal written agreement, to aid in developing alternate training. The agreement will establish controls on use of the materials and the qualifications of those who deliver the training. If the agreement does not include all course materials outlined above, it will be incumbent on the Agency to develop the required materials that are not specifically provided for in the agreement. FHWA's review and approval of alternate training is required regardless of an Agency's choice to use NHI course materials for any part of the course development or delivery. (23 CFR 650.309(h)(2)).
- g. A program manager, team leader, or underwater bridge inspection diver who successfully completes an FHWA-approved alternate training course required for a specific role will have met the training requirements of the regulation to perform that specific role for any Agency. (23 CFR 650.309(a)(2), (b)(2), (c)(2), and (e)).

**6. What are the responsibilities of the Division offices in the review and approval of NBIS alternate bridge inspection training?**

- a. Confirming the requesting Agency has reviewed this Guidance. Assisting the Agency in understanding the Guidance, available options, and requirements.
- b. Reviewing the Agency's course-specific FHWA Checklist (see below). Reviewing the documents submitted by the Agency to ensure that the Checklist criteria have been considered.
- c. When all materials are in order, recommending that the FHWA Office of Bridges and Structures (HIBS) review and approve the alternate training.
- d. Coordinating with the Agency the resolution of FHWA comments on the submission until HIBS approval is achieved.
- e. Upon approval notification from HIBS, providing written notification of approval to the Agency, copying HIBS on the correspondence.
- f. Monitoring implementation of the FHWA-approved alternate training per the requirements of the National Bridge Inspection Program oversight process and any additional recommendations from HIBS.

**7. What are the responsibilities of HIBS in the review and approval of NBIS alternate bridge inspection training?**

- a. Developing and maintaining course-specific Checklists that outline NBIS alternate training requirements, including course topics, related content, approximate hours of training per topic, and the end-of-course assessment. Making these Checklists available on FHWA's website.
- b. Coordinating with the NHI when an Agency wishes to use NHI course materials to develop their course and ensuring appropriate execution of the NHI/FHWA Memorandum of Agreement (MOA) which establishes controls on the use of NHI training materials and the qualifications of those who deliver the training.
- c. Reviewing alternate training course submissions in accordance with this Guidance and the course-specific Checklists, and providing comments and recommendations for improvement of the alternate training to the Division to meet the requirements of the NBIS and ensure national consistency.
- d. Coordinating with the Division in the resolution of comments and recommendations prior to approval.
- e. Upon resolution of all comments and recommendations, providing written approval of the alternate training course to the Division.
- f. Maintaining a registry of all FHWA-approved NBIS alternate bridge inspection courses.