



Transportation & Aviation Services, DOT & Regulatory Compliance

Department of Transportation

**TRAN-2043M Anti-Drug & Alcohol Misuse and
Prevention Plan**

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Drug and Alcohol-Free Workplace Department



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Chapter 1: General Program Provisions

1 Items of Understanding

1. Establish a Committee to review PG&E's Department of Transportation ("DOT") Drug and Alcohol Testing Program Policy as needed.
2. Company will utilize laboratories that are HHS-certified for all tests administered under this Plan and will follow all DOT testing Programs.
3. Substances will be added to the panel for testing as required by the DOT's Procedures for Transportation Workplace Drug and Alcohol Testing Programs (Title 49 CFR Part §40).
4. Bargaining Unit employees have the right to a shop steward under the following conditions:
 - a. Before and during discussions with management for a reasonable suspicion test
 - b. Before an interview with a Substance Abuse Professional or Medical Review Officer (MRO)
 - c. Before a discussion to determine a rehabilitation program following a verified positive
 - d. If the employee believes the collector is not following established procedures outlined in the Random Drug Test Employee Checklist and the employee has first contacted the supervisor
5. Employees will be informed in writing of negative alcohol test results at the time of testing. Employees will have up to six months following a negative drug test to request another copy of the test results.
6. The split sample method of collection will be used. Following a verified positive ruling and an interview with the MRO, the employee may verbally or submit a written request to the MRO to direct the Company's designated secondary HHS certified laboratory to test the second specimen bottle for presence of the drug(s) that resulted in the first verified positive result. The request for secondary testing must be made within 72 hours from the time of notification of the positive result specimen. If the MRO concludes that the employee had a legitimate reason for missing the 72-hour deadline, the split specimen can still be tested.
7. The MRO will not consider the results of any tests that were obtained outside of the PG&E's DOT Drug and Alcohol Testing Program.
8. A mobile collection site may be used for drug and alcohol testing at the Company's discretion.
9. The Company will conduct random drug and alcohol tests at the minimum annual rates set forth by the (DOT). The Company will use the highest cut-off levels permitted by the DOT as outlined in Title 49 CFR Part §40.87 for both screening and confirmation tests.



10. Information provided to the MRO or Substance Abuse Professional (SAP) by the employee will be disclosed by the MRO or SAP for the following reasons:
 - a. If it relates to issues raised in a union grievance procedure
 - b. As required by law
 - c. At the request of the employee
11. If 60 months or more have elapsed since an employee's verified positive random test and there have been no further positive tests during the 60 months period, the first test will not be used to support disciplinary action on subsequent verified positive tests.
12. An employee who has a verified positive reasonable suspicion or post-accident test and has a subsequent verified positive test, regardless of when the first verified positive test occurred shall be discharged.
13. An employee who self-identifies to the Employee Assistance Program (EAP) under the Voluntary Self-Identification Policy (see Chapter 10) and follows EAP's recommended course of treatment will not be deemed to have tested positive for disciplinary purposes if they test positive for a drug or alcohol on a Forensic drug and/or alcohol test). The employee will, be required to fully and timely comply with an EAP-specified education and/or treatment program and submit to a non-DOT drug and/or alcohol test prior to returning to work. If the employee falls under the FMCSA Regulations, upon successful completion of an educational or treatment program as determined by EAP, he/she will also be required to have a negative DOT Return-to-duty test (Drug and/or Alcohol) prior to performing safety-sensitive functions per Title 49 CFR Part §382.121 in the FMCSA regulations. *Failure to fully comply with EAP's recommendations within 3 days after a written notification of non-compliance will result in discharge. A subsequent positive result shall result in discharge.*
14. Nothing in this policy shall be construed to permit the delay of necessary medical attention for injured people following an accident or to prohibit an employee from leaving the scene of an accident to obtain medical or other emergency assistance in response to the accident. The employee must remain available for testing for up to 32 hours after the accident (8 hours for the alcohol test and 32 hours for the drug test).
15. The notification to the immediate supervisor of an employee's random drug and/or alcohol test may occur up to 3 working days prior to the scheduled date of the test. Improper use of this information by the supervisor or any employee will result in disciplinary action or discharge.
16. Employees who test positive on a transfer test will be required to be evaluated by EAP and follow the recommended course of primary treatment. The EAP will conduct a subsequent evaluation for compliance and readiness to return to work. A negative test result on a DOT drug and/or alcohol test may be required prior to the employee's return to a non-DOT classification as determined by EAP.
17. Employees who test positive on a transfer test, return to their base classification, and subsequently accept a DOT-covered position will be required to submit proof of completion of the DOT return-to-duty process and be placed in the DOT First Time Violators program including follow-up testing up to 60 months based on the SAP/EAP recommendations.



18. Employees who refuse to test or refuse to cooperate in the collection process will be treated the same as a verified positive test result and be subject to discipline or discharge.
19. Employees who adulterate or substitute their specimen will be discharged and their test will be cited as a refusal to test.

2 Prohibited Conduct

1. No employee shall use or be under the influence of alcohol or illegal drugs at work. This includes marijuana, which may otherwise be legal per state law.
2. The use of any substance, prescription or over the counter medication, which carries a warning label that indicates that mental functioning, motor skills, or judgment may be adversely affected must be reported to supervisory personnel and medical advice and written authorization from the attending physician must be sought by the employee, as appropriate, before performing work related duties.
3. If the employee refuses to provide an alcohol or controlled substance test specimen (be tested) or willfully fails to follow test procedures causing the test to be invalid, the supervisor will immediately remove the employee from his/her work responsibility for insubordination and the refusal will be treated as if the employee had a verified positive test.
4. Following a verified positive result, the employee will be required to complete the return-to-duty process with a Substance Abuse Professional (SAP), follow his/her instructions, and comply with the treatment/education recommendations and be subjected to follow-up testing. A non-compliance letter from a SAP will result in discharge.
5. If an employee willfully tampers with the controlled substance or alcohol test specimen, the supervisor will remove the individual from his/her job duties and the employee will be discharged.
6. No employee shall report for duty or remain on duty requiring the performance of safety-sensitive functions while having an alcohol concentration of 0.02 or greater.
7. No employee tested under these regulations who is found to have an alcohol concentration of 0.02 or greater but less than 0.04 shall perform safety-sensitive functions. In this event, an employer may not permit the employee to perform or continue to perform safety-sensitive functions until the start of the employee's next regular scheduled duty period, but not less than 24 hours following administration of the test and following a negative alcohol test. Employees falling under the application of these provisions will be removed from duty with permission and without pay until the start of the employee's next regularly scheduled duty period, but not less than 24 hours following administration of the test.



After returning from the collection site, if an employee tested under these regulations was found to have an alcohol concentration of 0.02 or greater but less than 0.04, the employee should not be allowed to return to performing any covered functions. The supervisor should instruct the employee to make arrangements to be transported home. The employee should be instructed not to drive any motor vehicle due to the fact that he/she is under the influence of alcohol. If the employee insists on driving, the local law enforcement authority should be notified that an employee who the company believes may be under the influence of alcohol is leaving the company premises driving a motor vehicle. In no event may the employee drive a company vehicle home.

8. Company shall inform the employee required to take a post-accident alcohol test that he/she shall not use alcohol for eight hours following the accident, or until he/she undergoes a post-accident alcohol test, whichever occurs first.

3 DOT First-Time Violator Policy

The purpose of this policy is to furnish disciplinary and treatment guidelines for handling first-time violators of the Drug and Alcohol Testing Program Policy.

3.1 Coverage

This policy covers employees with service tenure of six months or more who are first-time violators of any one of the following prohibitions set forth in the Drug and Alcohol Testing Program Policy.

3.2 Alternatives to Termination of Employment

The guidelines contained in the policy are alternatives to immediate termination of employment. The refusal of an employee covered by this policy to comply with the specified guidelines shall result in the immediate discharge of the employee.

3.3 Discipline

A regular status employee covered by this policy who has no active discipline shall receive a Written Reminder (union) or Written Warning (management). This policy does not preclude the termination of the employment of an employee for a first-time violation if the employee's prior employment/disciplinary history is unsatisfactory or the employee is on probationary status, or the employee is a management employee in a leadership position.

3.4 Education and Treatment

An employee covered by this policy shall complete the mandated return to duty process prescribed by the Substance Abuse Professional (SAP) selected by the Company's Employee Assistance Program. *The employee shall not bear the costs of the rehabilitation program and shall be entitled to seek whatever available vacation, sick leave and/or medical leave benefits necessary for program participation.*



3.5 Follow-up

An employee covered by this policy shall be subject to follow-up testing for up to 60 months from the date the employee is returned to duty.

3.6 DOT Return to Duty Agreement

An employee covered by this policy shall execute a written DOT Return to Duty Agreement with the Company, which shall be retained in the employee's personnel file.



4 Test Types and Controlled Substances

4.1 Controlled Substances

The following DOT testing is required for controlled substances:

	CDL Pool (FMCSA)	GAS Pool (PHMSA)	Aviation Pool (FAA)
Pre-employment	Yes	Yes	Yes
Post-accident	Yes	Yes	Yes
Random	Yes	Yes	Yes
Reasonable Suspicion	Yes	Yes	Yes
Return to Duty	Yes	Yes	Yes
Follow-up	Yes	Yes	Yes

Current federal regulations require screening for the following controlled substances:

- Marijuana
- Cocaine
- Opiates (including Heroin)
- Amphetamines
- Phencyclidine (PCP)
- Ecstasy (MDMA)



**Chapter 1: General Program Provisions
Test Types and Controlled Substances**

The following table shows the required DOT Drug test types and cutoff amounts:

TYPE OF DRUG Initial Test Analyte	INITIAL TEST Cutoff Concentration	CONFIRMATORY TEST Analyte	CONFIRMATORY TEST Cutoff Concentration
Marijuana metabolites	50 ng/mL	THCA ⁹	15 ng/mL
Cocaine metabolites	150 ng/mL	Benzoyllecgonine	100 ng/mL
Opiate metabolites: Codeine/Morphine	2000 ng/mL	Codeine Morphine	2000 ng/mL 2000 ng/mL
6-acetylmorphine (6-AM)	10 ng/mL	6-acetylmorphine (6-AM)	10 ng/mL
Phencyclidine (PCP)	25 ng/mL	Phencyclidine	25 ng/mL
Amphetamines: AMP/MAMP	500 ng/mL	Amphetamine Methamphetamine	250 ng/mL 250 ng/mL ¹³
MDMA	500 ng/mL	MDMA ¹⁰ MDA ¹¹ MDEA ¹²	250 ng/mL 250 ng/ml 250 ng/mL



4.2 Alcohol

The following testing is required for alcohol:

	CDL Pool (FMCSA)	GAS Pool (PHMSA)	Aviation Pool (FAA)
Pre-employment	No	No	No
Post-accident	Yes	Yes	Yes
Random	Yes	No	Yes
Reasonable Suspicion	Yes	Yes	Yes
Return to Duty	Yes	Yes	Yes
Follow-up	Yes	Yes	Yes



5 Contractors

The company complies with the Contractor (PHMSA) Title 49 CFR Part §199.245 regulation listed below:

1. With respect to those covered employees who are contractors or employed by a contractor, an operator may provide by contract that the alcohol testing, training and education required by this subpart be carried out by the contractor provided:
 - a. The operator remains responsible for ensuring that the requirements of this subpart and Title 49 CFR Part §40 are complied with; and
 - b. The contractor allows access to property and records by the operator, the Administrator, any DOT agency with regulatory authority over the operator or covered employee, and, if the operator is subject to the jurisdiction of a state agency, a representative of the state agency for the purposes of monitoring the operator's compliance with the requirements of this subpart and Title 49 CFR Part §40.



Chapter 2: DOT-Covered Jobs

1 Covered Classifications

Employees at Pacific Gas and Electric Company that are covered by the DOT are placed in the CDL or GAS pool for random selection purposes. Some employees may be subject to the regulations of more than one DOT agency; however, these employees will be placed in the CDL (FMCSA) pool for random testing.

1.1 CDL (Federal Motor Carrier Safety Administration or FMCSA)

This policy applies to every person who operates a commercial motor vehicle in interstate or intrastate commerce and is subject to the commercial driver's license requirements under DOT Title 49 CFR Part §382.

1. Under the DOT regulations, a commercial motor vehicle driver is defined as any person who operates a commercial motor vehicle. This includes, but is not limited to: full time, regularly employed drivers; casual, intermittent or occasional drivers; leased drivers and independent owner-operator contractors who are either directly employed by or under lease to an employer or who operates a commercial motor vehicle at the direction of or with the consent of an employer.
2. Accordingly, it is intended that the provisions of this document apply to employees that operate regulated commercial motor vehicles, employees in classifications receiving the CDLA premium, and employees in classifications who are designated as volunteer standby commercial drivers.

1.2 GAS (Pipeline Hazardous Material Safety Administration or PHMSA)

Employees to be covered under this policy are considered to be any person who performs on a pipeline (transmission and/or distribution facilities), any operating, maintenance, or emergency response functions as regulated by DOT under Title 49 CFR Part §192, §193, or §195, and pertains to employees performing functions directly related to pipeline safety regulations.

1. Management and bargaining unit employees on rotational or temporary assignments may occasionally fall within the legal definition of a covered employee.
2. Contract or agency workers are included when they are engaged in covered work. They will meet these guidelines by implementing their own program which meets the DOT's and the Company's requirements.

Employees who are in a Gas pool classification and possess a commercial driver's license are placed in the CDL (FMCSA) pool.



2 Commercial Driver's License Classifications

Utility Operations – Operations, Maintenance, and Construction (IBEW CDLA Classification)

Classification	Classification Code
Apprentice Cable Splicer	50010376
Apprentice Electrician-Electric & Hydro	50010155
Apprentice Fitter	50010168
Apprentice Lineman	50010245
Apprentice Lineman Transmission	50010260
Cable Splicer	50010375
Crane Operator	50010317
Electric Crew Foreman	50010191
Electric Crew Foreman - Transmission	50010193
Electric Maintenance Crew Leader	50010194
Electric Transm & Dsbn Assistant	50010242
Electrician - Electric & Hydro	50010149
Equipment Mechanic	50010273
Equipment Mechanic - DCPD	50010276
Equipment Operator - Gas	50010320
Field Clerk - Electric Transm & Dsbn	50010147
Fieldperson	50010161
Fitter	50010167
Fitter – Arc	50010169
Garage Subforeman	50010186
Gas Control Technician - CGT	50010427
Gas Crew Leader Non-Welding	50010175
Gas Crew Leader Welding	50010174
Gas Mechanic	50010283
Heavy Equipment Operator	50010322
Lead Driver	50010144
Lineman	50010244
Lineman - Transmission	50010241
Mechanic – Welder - CGT	50010298
Night Cable Splicer	50010378
Night Electric Transm & Dsbn Assistant	50010243
Transm & Dsbn Equipment Opr - Transm	50010324
Transmission & Distribution Equip Opr	50010323
Transmission Mechanic – CGT	50010294
Truck Driver Heavy – Gas	50010148
Unassigned Cable Splicer	50010380



**Chapter 2: DOT-Covered Jobs
Gas Pipeline Covered Classifications**

Utility Operations – Operations, Maintenance, and Construction (IBEW CDLA Classification)

Classification	Classification Code
Unassigned Electrician – Elec & Hydro	50010156
Unassigned Fitter	50010170
Unassigned Lineman	50010246
Unassigned Transmission Mechanic - CGT	50072958
Unassigned Water System Repairperson	50010361
Underground Constr Crew Frmn - Electric	50010188
Underground Constr Crew Frmn - Gas	50010189
Underground Constr Journeyman - Elec	50010234
Underground Constr Journeyman - Gas	50010235
Working Foreman*	50010202
Utility Equipment Mechanic – Auberry	50010271
Utility Equipment Mechanic – Helms	50010272
Utility Operator – Hydro	50010347
Water System Repairperson	50010362
Pre-apprentice Lineman	50368698
Backhoe Operator – *Gas Req after 1/1/2009	50010305
Crane Operator - Davis	50070801
Crane Operator - GC Field - Gas	50010318
Crane Operator – GC Field – Not Gas	50253877
Driller	50010140
Equipment Mechanic - GC	50010277
Field Garage Mechanic A	50010279
Field Garage Mechanic C	50010281
Field Mechanic Inspector	50010230
Fieldperson - GC - Gas	50010162
Fieldperson - Tower	50210150
Hole Digger Operator	50010326
Mechanical Inspector	50010231
Miscellaneous Equipment Operator-Gas	50010321
Miscellaneous Equipment Operator-Not Gas	50253878
Pre-apprentice Lineman - GC	50368700
Tapping Technician	50258203
Tractor Operator - Gas	50010351
Tractor Operator-Not Gas	50253879



3 Gas Pipeline Covered Classifications

Utility Operations – Operations Maintenance and Construction (IBEW List of Classification)

IBEW classifications listed below are covered under DOT testing guidelines.

Classification	Classification Code
Meter Maintenance Person	50406798
W&R Dispatcher in Training-Metering	50486040
W&R Dispatcher-Metering	50486038
W&R Relief Dispatcher Metering	50486039
Underground Construction Crew Foreman Electric	50010188
Underground Construction Journeyman Electric	50010234
CIP Inspector	50010372
Gas Service Representative	50010373
Lead Gas Service Representative	51645906
Meter Reader	50010475
Service Mechanic	50010293
Utility Gas Service Rep	51645908
W&R Dispatcher-In-Training Gas	50073353
Work and Resource Dispatcher-Gas	50073351
Work and Resource Relief Dispatcher-Gas	50073352
Apprentice Corrosion Mechanic	51654541
Apprentice Fitter-Arc	51636998
Corrosion Mechanic-NACE CP1	51654542
Gas Compliance Representative	51654546
Gas Crew Leader-Arc	51654530
Gas Mechanic	50010283
Gas T&D Equipment Operator	51654537
Lead Corrosion Mechanic	51654545
M&C Coordinator	50315042
Senior Corrosion Mechanic-NACE CP2	51654543
Senior Gas Compliance Representative	51654548
Senior Gas T&D Equipment Operator	51654540
Unassigned Corrosion Mechanic-NACE CP1	51708057



**Chapter 2: DOT-Covered Jobs
Gas Pipeline Covered Classifications**

Utility Operations – Operations Maintenance and Construction (IBEW List of Classification, continued)

Classification	Classification Code
Unassigned Fitter-Arc	51654528
Apprentice Fitter (PIO)	50010168
Corrosion Mechanic (PIO)	50010270
Fieldperson	50010161
Fitter – Arc	50010169
Fitter (PIO)	50010167
Gas Crew Leader (Non-welding) (PIO)	50010175
Gas Crew Leader	50010174
Gas Mechanic	50010283
Heavy Truck Driver (PIO)	50010148
Night Fieldperson	50070741
Unassigned Fitter (PIO)	50010170
Underground Construction Crew Leader Gas	50010189
Underground Construction Journeyman Gas	50010235
Utility Worker	50010217
Working Leader-Division Gas T&D	51781783
Welder	50010436
Working Foreman C (PIO)	50010206
Apprentice Gas Technician	50010415
Apprentice Welder	50010438
Backhoe Operator	50010305
Carpenter	50010096
Construction Inspector	51665126
Construction Operator-GC Gas	51664847
Drilling Working Foreman B	50010201
Drilling Working Foreman C (PIO)	50010203
Gas Mechanic (PIO)	50010284
Gas Technician	50010416
Lead Tapping Technician	51879770
Gas Technician	50010416
Pipeline Inspector CWI	51665127
Senior Construction Operator-GC Gas	51664846
Street Fitter	50010171
Tapping Technician	50258203



**Chapter 2: DOT-Covered Jobs
Gas Pipeline Covered Classifications**

Utility Operations – Operations Maintenance and Construction (IBEW List of Classification, continued)

Classification	Classification Code
Technical Crew Leader A - Gas	50010176
Technical Crew Leader B - Gas	50010177
Technician Crew Leader A	50010176
Technician Crew Leader B	50010177
Utility Construction Inspector	51664850
Utility Worker	50010223
Welder – Arc	50072900
Welder In-Service	50497923
Welder-GC-Gas	50010435
Working Foreman A	50251366
Working Foreman B	50251368
Working Leader-GC Gas	51781311
Painter – Utility Worker	50070802
Painter A	50010354
Painter B	50010355
Working Foreman B (Climbing)	50010205
Instrument Technician	50070715
Working Foreman B-non-climbing	50251367
Apprentice Distribution Gas System Operator	50489164
Distribution Gas System Operator	50489065
Senior Distribution Gas System Operator (Relief)	51836159
Apprentice Transmission Mechanic	50072871
Apprentice Gas Control Technician	50072865
Apprentice M&C Mechanic (PIO)	50010290
Apprentice Station Operator	51664844
Apprentice Transmission Gas System Operator	50073138
Engine Analyst	50202594
Field Meterperson	50010300
Gas Control Technician	50010427
Gas Control Technician – TPCO	51530458
Gas Transmission M&C Coordinator	50315041



**Chapter 2: DOT-Covered Jobs
Gas Pipeline Covered Classifications**

Utility Operations – Operations Maintenance and Construction (IBEW List of Classification, continued)

Classification	Classification Code
Lead Gas Control Tech	50072607
Lead Gas Control Technician - TPCO	51527024
Lead Mechanic-Welder - TPCO	51530457
Lead Mechanic-Welder (TPCO) In-Service Welding	51790919
Lead Transmission Mechanic	51664842
LNG/CNG Technician	51567004
M&C Mechanic (PIO)	50010288
Maintenance Assistant	50010066
Maintenance Assistant I	50010068
Mechanic Welder	50010298
Mechanic Welder In-Service	51517789
Operator (PIO)	50210203
Operator Mechanic I (PIO)	50010332
Relief Senior Station Operator	50210205
Senior Gas Transmission Operator (PIO)	50010309
Senior LNG/CNG Technician	51567005
Senior Maintenance Assistant	50010065
Senior Station Operator	50210204
Station Operator	51664843
Station Operator Unassigned	51666202
Transmission Gas System Operator	50010314
Transmission Mechanic	50010294
Transmission Mechanic - TPCO	51527201
Unassigned Gas Control Technician	51664845
Unassigned M&C Mechanic (PIO)	50010289
Unassigned Transmission Mechanic	50072958
Utility Worker	50010219
Utility Worker-TPCO	51527202
Utility Worker-TPCO (Hired after 3/1/16)	51852535
Working Foreman A-Gas In-Service Welding	51517786
Working Foreman B-Gas In-Service Welding	51517784



4 Hiring Hall Classifications

All classifications listed below are covered under DOT testing guidelines.

Note: Any other Hiring Hall classification that has an equivalent regular classification that is covered by DOT should be covered as well as the classifications listed below.

Classification	Classification Code
HH Backhoe Operator	50070861
HH Backhoe Operator-GC-GAS-I	50070947
HH Carpenter	50070866
HH Carpenter A-E	50071082
HH CIP Inspector – I	50071210
HH Corrosion Mechanic	50010101
HH Corrosion Mechanic-I	50070993
HH Credit Representative-E	50222829
HH Credit Representative-I	50222828
HH Credit Representative-E	50222829
HH Driller – E	50070924
HH Driller – E	50070924
HH Driller – I	50070926
HH Fieldperson	50070869
HH Fieldperson – E	50010081
HH Fieldperson – GC-GAS-I	50070949
HH Fieldperson – I	50070871
HH Fitter – Arc	50070992
HH Gas Crew Foreman	50070945
HH Gas Fitter	50010102
HH Gas M&C Mechanic	50010098
HH Gas Mechanic – E	50071006
HH Gas Mechanic – I	50071008
HH Gas Service Rep	50071072
HH Gas Service Rep	50010083
HH Gas Trans System Operator – E	50071202
HH Installers/Meter Reader-E	50234728
HH Installers/Meter Reader-I	50109863
HH Machinist-E	50010133
HH Meter Reader-E	50010071
HH Meter Reader-I	50010070



Hiring Hall Classifications (continued)

Classification	Classification Code
HH Meter Reader-E	50010071
HH Meter Reader-I	50010070
HH Miscellaneous Equipment Operator - Electric	50010077
HH Miscellaneous Equipment Operator - Gas	50070863
HH Painter A	50010093
HH Painter B – E	50070909
HH Painter B- I	50070910
HH Painter Utility Worker-E	50070911
HH Painter Utility Worker-I	50071120
HH Senior Meter Regulator Mechanic	50070989
HH Service Operator-E	50070872
HH Street Fitter	50070865
HH Street Fitter-GC-E	50071146
HH Utility Worker – Gas-E	50070862
HH Utility Worker – Gas-I	50070870
HH Utility Worker – GC Gas	50070868
HH Utility Worker-E	50071055
HH Welder	50070864



5 ESC Classifications

Note: Any other Hiring Hall classification that has an equivalent regular classification that is covered by DOT should be covered as well as the classifications listed below.

All classifications listed below are covered under DOT testing guidelines.

Classification	Classification Code
Field Engineer	50010519
Senior Field Engineering Technician	50010520
Field Engineering Technician	50010521

Hiring Hall Classifications

Classification	Classification Code
HH Field Engineer	50010569
HH Senior Field Engineering Technician	50071192
HH Field Engineering Technician	50071086



6 Management and Administration Technical Classifications

Admin Classifications

Classification	Classification Code
Administrative Clerk	50010586
Administrative Clerk, Senior	50010588
Apprentice Welder Opns Coordinator, Sr	51526312
Business System Specialist, Associate	51714599
Construction Manager, Asc	51691633
Director's Assistant	50074207
Executive Assistant	50389711
Field Training Coordinator	50455891
Field Training Coordinator, Expert	50455893
Field Training Coordinator, Senior	50455892
Gas Asset Maintenance Strategist	51552666
Gas Asset Maintenance Strategist, Asc	51565878
Gas Asset Maintenance Strategist, Expert	51795750
Gas Asset Maintenance Strategist, Senior	51795746
Gas Clearance Coordinator	51517351
Gas Clearance Coordinator, Senior	51578094
Gas Document Analyst	51533021
Gas Engineering Development Coordinator	51775853
Gas EP&PA Support Specialist, Senior	51675769
Gas Qualification Analyst	51584285
Gas Qualification Specialist	51551567
Gas Qualification Specialist, Associate	51551566
Gas Qualification Specialist, Senior	51551568
Gas Quality Management Specialist, Asc	51783393
Gas Safety Analyst, Associate	51512217



**Chapter 2: DOT-Covered Jobs
Management and Administration Technical Classifications**

Admin Classifications (continued)

Classification	Classification Code
Gas Safety Specialist	50497638
Gas System Coordinator	51517394
Gas Transportation Scheduler	51517398
Gas Transportation Scheduler, Senior	51517399
Intern	50011231
Public Safety Specialist, Senior	50400411
Quality Operations Specialist, Associate	51528485
Risk Analyst, Associate	51834128
Senior Director's Assistant	50083026
Senior Executive Assistant	50426076
Technical Assistant, Senior	50010597

Executive

Classification	Classification Code
Senior Vice President	50110373
Senior Vice President	50110374
Vice President	50110600
Vice President	50110601

Technical

Classification	Classification Code
Administrative Clerk, Senior	50010588
Gas E&D Safety Technical Spc, Senior	51696792
Technical Assistant, Senior	50010597



**Chapter 2: DOT-Covered Jobs
Management and Administration Technical Classifications**

Management

Classification	Classification Code
Advising Engineer, Senior	50010868
Aircraft Pilot	50010981
Aircraft Pilot, Associate	51536166
Asset Management Specialist, Principal	51551552
Benchmarking Analyst, Principal	51583290
Business Analyst	50010620
Business Analyst, Associate	50010607
Business Analyst, Expert	50314586
Business Analyst, Principal	50314587
Business Analyst, Senior	50010621
Business Operations Specialist	50418252
Business Operations Specialist, Asc	50504705
Business Operations Specialist, Expert	50504715
Business Operations Specialist, Prn	50504717
Business Operations Specialist, Senior	50504710
Business Performance Analyst	51474309
Business Performance Analyst, Expert	51474318
Business Performance Analyst, Senior	51474314
Business Process Analyst	50307510
Business Process Analyst, Associate	50419168
Business Process Analyst, Expert	50307511
Business Process Analyst, Principal	50372656
Business Process Analyst, Senior	50307512
Business Project Manager	50305169
Business Project Manager, Expert	50305171
Business Project Manager, Principal	50305173
Business Project Manager, Senior	50305174
Business System Specialist	51476928
Business System Specialist, Expert	50473652
Business System Specialist, Principal	50491233
Business System Specialist, Senior	50395611
Change Management Consultant	50088477
Change Management Consultant, Expert	50346779
Change Management Consultant, Principal	50071459
Change Management Consultant, Senior	50011040
Chemist, Senior	50011221
Chief of Staff	51630338
Chief of Staff, Principal	51630337
Communications Representative, Expert	50356288
Communications Specialist	50334355



**Chapter 2: DOT-Covered Jobs
Management and Administration Technical Classifications**

Management (continued)

Classification	Classification Code
Communications Specialist, Expert	50419533
Communications Specialist, Principal	50419534
Communications Specialist, Senior	50334357
Compliance Data Analyst	51515342
Compliance Data Analyst, Senior	51515350
Construction Manager	51691634
Construction Manager, Expert	51691636
Construction Manager, Senior	51691635
Construction, Supervisor-Nonexempt	50010750
Contract Administrator	50010941
Contract Administrator, Associate	50010942
Contract Administrator, Senior	50010943
Contract Pricing Analyst, Expert	51839530
Contract Specialist	50010944
Corrosion Engineer	51608687
Corrosion Engineer, Associate	51608686
Corrosion Engineer, Expert	51608689
Corrosion Engineer, Principal	51608690
Corrosion Engineer, Senior	51608688
Corrosion Specialist	51608048
Corrosion Specialist, Senior	51608047
Damage Prevention Awareness Spc, Asc	51638502
Damage Prevention Awareness Spc,Sr	51638506
Damage Prevention Awareness Specialist	51638504
Data Scientist, Senior	51767243
Dir, Corrosion Engineering & Services	51652783
Director, Distribution Integrity Mgmt	51608693
Director, Gas Control Strategy & Support	51694614
Director, Gas Dispatch & Scheduling	51549139
Director, Gas Field Services	51585078
Director, Gas Programs	51541224
Director, Gas Project Govt & Controls	51698860
Director, Gas Reservoir Engineering	51685163
Director, Gas System Planning	50011067
Director, Performance Improvement	51510861
Director, Tech Strategy and Solutions	51700318
Director, Transmission Integrity Mgmt	51639596
Director, Wholesale Mktg & Business Dev	51474175
Dir, Enterprise Correction Action Pgm	51662164
Dir, Enterprise Process & Info Mgmt	51669303



**Chapter 2: DOT-Covered Jobs
Management and Administration Technical Classifications**

Management (continued)

Classification	Classification Code
Dir, Facility Integrity Mgmt & Tech Svcs	51538354
Dir, Gas Codes, Standards & Training	51642220
Dir, Gas Dsbn Engineering and Design	51685164
Dir, Gas Transmission & Distribution	51693204
Dir, Gas Transmission Engg and Design	51685165
Dir, Gas Transm Projects & Programs	51698857
Distribution Superintendent	50010799
Distribution, Supervisor-Nonexempt	50010801
Emergency Preparedness Coordinator	51700399
Emergency Preparedness Coordinator, Exp	51774475
Emergency Preparedness Coordinator, Sr	51700400
Engineering, Manager	50010840
ERIM Archivist, Expert	51754010
Gas Accounting Analyst	50320636
Gas Accounting Analyst, Senior	50320637
Gas Account Manager	50011073
Gas Account Manager, Expert	51847593
Gas Account Manager, Senior	50071532
Gas Asset Data Specialist	51633133
Gas Asset Maintenance Specialist	51557182
Gas Asset Maintenance Specialist, Senior	51557183
Gas Clearance Resource Specialist, Sr	51581940
Gas Communication Specialist, Senior	51697746
Gas Contract Specialist	51507133
Gas Contract Specialist, Expert	50472388
Gas Contract Specialist, Senior	50472387
Gas Control Operations Specialist	51604676
Gas Control Operations Specialist, Sr	51604640
Gas Customer Service Analyst	50011177
Gas Customer Service Analyst, Senior	50011179
Gas Distribution Engineer, Expert	51711343
Gas Distribution Engineer, Senior	50010889
Gas Engineer	50010890
Gas Engineer, Associate	50462792
Gas Engineer, Chief	51685718
Gas Engineer, Expert	51669305
Gas Engineer, Principal	50010918
Gas Engineer, Senior	50010891
Gas FIMP Asset Specialist	51700031
Gas FIMP Asset Specialist, Expert	51700034



**Chapter 2: DOT-Covered Jobs
Management and Administration Technical Classifications**

Management (continued)

Classification	Classification Code
Gas FIMP Asset Specialist, Senior	51700033
Gas FIMP Engineer	51700129
Gas FIMP Engineer, Associate	51700128
Gas FIMP Engineer, Expert	51699686
Gas FIMP Engineer, Principal	51699688
Gas FIMP Engineer, Senior	51699685
Gas IM Engineer	51702464
Gas IM Engineer, Associate	51702455
Gas IM Engineer, Expert	51702469
Gas IM Engineer, Principal	51702473
Gas IM Engineer, Senior	51702467
Gas Maintenance, Supervisor-Nonexempt	50010752
Gas Market Relations Specialist, Senior	51449482
Gas Measurement Data Analyst	51705152
Gas Metering Engineer	51559959
Gas Metering Engineer, Senior	50010899
Gas Methods & Procedures Specialist, Exp	51698561
Gas Methods & Procedures Specialist, Sr	51698511
Gas Operations Compliance Specialist	51698564
Gas Operations Compliance Specialist, P	51698567
Gas Operations Compliance Specialist, Sr	51698565
Gas Operations Engineer, Expert	50320640
Gas Operations Specialist	50321007
Gas Outage Scheduling Coordinator, Sr	51557181
Gas Outage Scheduling Engineer	51557252
Gas Outage Scheduling Engineer, Senior	51557253
Gas Process Safety Engineer, Expert	51688983
Gas Process Safety Engineer, Principal	51688984
Gas Process Safety Engineer, Senior	51688982
Gas Program Manager	51630344
Gas Program Manager, Expert	51630346
Gas Program Manager, Principal	51630347
Gas Program Manager, Senior	51570137
Gas Qualification Analyst, Senior	51654474
Gas Quality Analyst, Senior	50459852
Gas Quality Assurance Auditor, Senior	50502267
Gas Quality Control Specialist	51694617
Gas Quality Control Specialist, Senior	51694618
Gas Quality Information Analyst	51698168
Gas Quality Information Analyst, Senior	51698169



**Chapter 2: DOT-Covered Jobs
Management and Administration Technical Classifications**

Management (continued)

Classification	Classification Code
Gas Quality Management Specialist	51702387
Gas Quality Management Specialist, Exp	51744477
Gas Quality Management Specialist, Sr	51702388
Gas Records Analyst	51701164
Gas Regulatory Specialist	51639827
Gas Regulatory Specialist, Expert	51557256
Gas Regulatory Specialist, Principal	51557257
Gas Reservoir Specialist	51642943
Gas Reservoir Specialist, Expert	51642945
Gas Reservoir Specialist, Senior	51642944
Gas Standards Engineer, Expert	51698502
Gas System Coordinator, Expert	51858677
Gas System Coordinator, Senior	51877378
Gas System Planning Engineer	51556617
Gas System Planning Engineer, Associate	51556712
Gas System Planning Engineer, Expert	51557226
Gas System Planning Engineer, Principal	51557227
Gas System Planning Engineer, Senior	51556619
Gas Systems Administrator	51625716
Gas Systems Performance Analyst, Expert	51710071
Gas Systems Performance Analyst, Prn	51710072
Gas Technical Specialist	50010892
Gas Technical Specialist, Associate	51660081
Gas Technical Specialist, Expert	51733556
Gas Technical Specialist, Senior	51660216
Gas Trader, Senior	50011176
Gas Transm Interconnection Mgr, Exp	51474160
Gas Transm Interconnection Mgr, Sr	51474159
Gas Transmission Engineer	51695845
Gas Transmission Engineer, Expert	51695849
Gas Transmission Engineer, Senior	51695846
Gas Transmission Financial Analyst, Sr	51474166
Gas Transmission O&M Specialist	51697881
Gas Transmission O&M Specialist, Senior	51697884
Gas Transmission Product Manager, Expert	51449494
Gas Transmission Product Manager, Prn	51449495
Gas Transmission Product Manager, Senior	51449492
Gas Transmission Quantitative Anl, Exp	51474163
Gas Transmission Trader, Expert	51449478
Gas Transmission Trader, Senior	51449476



**Chapter 2: DOT-Covered Jobs
Management and Administration Technical Classifications**

Management (continued)

Gas Workforce Analyst, Principal	51639904
Gas Work Methods & Prcdre Speclst, Exp	51697150
GRC LOB Case Manager, Principal	50410800
GRC Witness Prep Specialist, Senior	50410798
Information Systems Analyst, Senior	50010713
In-Line Inspection Specialist, Principal	51738273
LNG/CNG Transmission Specialist	51698855
LNG/CNG Transmission Specialist, Senior	51698856
Manager, Business Analysis	50327738
Manager, Communications	50010662
Manager, Corrective Action Program	51702380
Manager, Corrosion Engineering	51727376
Manager, DIMP Engineering	51608691
Manager, Emergency Preparedness	51774474
Manager, Emerg Mgmt & Public Safety	51515328
Manager, Gas Business Strategy	51612809
Manager, Gas Business Systems Support	51700321
Manager, Gas Construction Management	51695339
Manager, Gas Customer Service	50011100
Manager, Gas Dispatch	51517137
Manager, Gas Distribution Design	51684666
Manager, Gas Distribution Engineering	51685636
Manager, Gas Distribution GIS Mapping	51684673
Manager, Gas Field Safety	50384190
Manager, Gas Field Services	51585079
Manager, Gas First Responder Programs	51678677
Manager, Gas Mapping Planning & Support	51684674
Manager, Gas Measurement Services	51704947
Manager, Gas Methods & Procedures	51701013
Manager, Gas Operations Engineering	50321329
Manager, Gas Ops Compliance and Risk	51770297
Manager, Gas Outage Scheduling	50384585
Manager, Gas Plant Engineering & Design	51685633
Manager, Gas Process Safety	51685632
Manager, Gas Programs	50386455
Manager, Gas Proj Stds & Governance	51698862
Manager, Gas Public Works Coordination	51734079
Manager, Gas Qualification	51584283
Manager, Gas Quality Management	51702381
Manager, Gas Scheduling & Accounting	50321327
Manager, Gas Support Services	51696062
Manager, Gas Sys Governance & Support	51700322



**Chapter 2: DOT-Covered Jobs
Management and Administration Technical Classifications**

Management (continued)

Classification	Classification Code
Manager, Gas System Operations SCADA	51694508
Manager, Gas System Planning Engineering	51557255
Manager, Gas Technology Project Mgmt	51695134
Manager, Gas Transmission & Distribution	51693205
Manager, Gas Transmission GIS Mapping	51685631
Manager, Gas Transmission Trading	50011150
Manager, Gas Trans Ops & Processes	51551565
Manager, Gas Workstream Program	51584925
Manager, IM R&D and Innovation	51706030
Manager, LNG/CNG Field Operations	51649057
Manager, Non-destructive Examination	51610775
Manager, PFL Services/MAOP Engineering	51760470
Manager, Pipeline Services	51704944
Manager, Process Improvement	50452732
Manager, Records Information Management	50546705
Manager, Records Operations	51882480
Manager, Resource	50071699
Manager, Station Assessments	51704943
Manager, Station Services	51704949
Manager, System Gas Control	50321326
Manager, TIMP Implementation	51706027
Manager, TIMP Risk Management	51706028
Manager, Work Mgmt Technology Solutions	51700323
Mgr, Engineering Pgms and Admntv Supprt	51684671
Mgr, Gas Engineering & Design Services	51685628
Mgr, Gas Instrmnt Controls & Electrical	51685634
Mgr, Gas Pipeline Engineering & Design	51685630
Mgr, Gas Records and Information Mgmt	51701180
Mgr, Gas Transmission Ops & Compliance	51625719
Mgr, Perf Measurement & Program Controls	51528489
Mgr, Project Mgmt Center of Excellence	51577951
Mgr, Tech Solutions Change Leadership	51672660
Mgr, Work Mgmt and Performance Systems	51515690
NDE Specialist, Senior	51652306
Operations Data Analyst	51607121
Operations Data Analyst, Expert	51607125
Operations Data Analyst, Senior	51607122
Operator Qualification Analyst	50376210
PNG Outage Coordinator	51698174
PNG Outage Coordinator, Senior	51698853



**Chapter 2: DOT-Covered Jobs
Management and Administration Technical Classifications**

Management (continued)

Classification	Classification Code
Process Improvement Consultant, Expert	51738194
Process Improvement Consultant, Prn	50452569
Process Improvement Consultant, Senior	50452568
Project Deployment Planner, Expert	50361417
Project Management Analyst	50011120
Project Management Analyst, Senior	50011130
Quality Operations Specialist	51528486
Quality Operations Specialist, Expert	51528488
Quality Operations Specialist, Senior	51528487
Records Information Mgt Spec, Prn	50546704
Reservoir Engineer, Principal	51611848
Reservoir Engineer, Senior	51611840
Risk & Compliance Analyst	51735287
Risk & Compliance Analyst, Expert	51735288
Risk & Compliance Analyst, Principal	51735771
Risk & Compliance Analyst, Senior	51737165
Safety Specialist	50210335
Safety Specialist, Expert	51557239
Safety Specialist, Senior	50210336
SCADA Specialist	50010716
SCADA Specialist, Expert	50417044
SCADA Specialist, Senior	50010717
Senior Director	50011057
Senior Director, Chief of Staff	50285937
Senior Director, Gas System Operations	51694509
Senior Director, Gas T&D Construction	51671338
Senior Manager, Business Technology	50418263
Senior Manager, Gas Contract Management	51857837
Senior Manager, Gas Operations	51478525
Senior Manager, Gas Quality Management	51711342
Senior Manager, Gas System Planning	51670645
Senior Manager GIS & Eng Tech Solutions	51700320
Senior Manager, Operations Systems	50359348
Senior Manager, Process Excellence	51895048
Specialist, Supervisor-Exempt	50010784
Sr Dir, Aset Knwldg & Integrity Mgmt	51714853
Sr Dir, Strat & Process Excellence	51714855
Sr Manager, Asset Knowledge Management	51760471
Sr Manager, Gas GIS Mapping	51685166
Sr Manager, Gas Training and Implement	51697377



**Chapter 2: DOT-Covered Jobs
Management and Administration Technical Classifications**

Management (continued)

Classification	Classification Code
Sr Manager, Gas Trans Product Mgmt	51474171
Sr. Manager, LNG/CNG Engineering & Ops	51649058
Sr Manager, Records Information Mgt	50546706
Sr Manager, Tech Strategy & Solutions	51700319
Sr Mgr, Gas Construction Project Ops	51722255
Sr Mgr, Gas Distrib and Transm Control	51809948
Sr Mgr, Gas Opr, Work & Resource Plng	51695843
Sr Mgr, Gas Pipeline Engg & Design	51685167
Sr Mgr, Gas Transmission & Distribution	51714854
STS Technical Specialist, Senior	51703334
Supervisor, ATS Business Operations	50010627
Supervisor, Business Analysis	51581935
Supervisor, Control Center	50010777
Supervisor, Corrosion Engineering	51672657
Supervisor, Emergency Preparedness	51774473
Supervisor, Engineer Development Program	51685640
Supervisor-Exempt, Gas Clearance	50442598
Supervisor-Exempt, Gas Operations	50449397
Supervisor, Field Metering	50010833
Supervisor, Gas Asset Mtce Strategy	51555107
Supervisor, Gas Construction Engineering	51695337
Supervisor, Gas Contract Management	51712256
Supervisor, Gas Design Drafting	51685638
Supervisor, Gas Dispatch	51547640
Supervisor, Gas Dispatch Lead	51547641
Supervisor, Gas Distrib Project Mgmt	51698864
Supervisor, Gas Distribution Clearance	51695223
Supervisor, Gas Distribution Engineering	51685641
Supervisor, Gas Distribution GIS Mapping	51685642
Supervisor, Gas Document Management	51698863
Supervisor, Gas Estimating	50011237
Supervisor, Gas Field Compliance	51701023
Supervisor, Gas Field Services	51585080
Supervisor, Gas FIMP Engineering	51704294
Supervisor, Gas Ins, Controls & Elec	51685712
Supervisor, Gas Measurement and Control	51702383
Supervisor, Gas Measurement Data Mgmt	51704295
Supervisor, Gas Methods and Procedures	51702385
Supervisor, Gas Operations Support	51678498
Supervisor, Gas Order Management	51685646



**Chapter 2: DOT-Covered Jobs
Management and Administration Technical Classifications**

Management (continued)

Classification	Classification Code
Supervisor, Gas Pipeline Eng & Design	51685647
Supervisor, Gas Public Safety	51696788
Supervisor, Gas Qualification	51584284
Supervisor, Gas Quality Management	51701163
Supervisor, Gas Reservoir Specialist	51702389
Supervisor, Gas Support Services	51696063
Supervisor, Gas System Operations	50010755
Supervisor, Gas Tech Process Imprvmt	51696791
Supervisor, Gas Transm Project Clearance	51695376
Supervisor, Gas Welding	51636167
Supervisor, Gas Work Mgmt SAP Solutions	51696790
Supervisor, Gas Workstream Program	51584922
Supervisor, GIS Analytics	51546809
Supervisor, IM Data Delivery & Analysis	51706031
Supervisor, LNG/CNG Engineering	51648819
Supervisor-Nonexempt, Gas Operations	50321009
Supervisor-Nonexempt, Gas System	50321923
Supervisor, Program Perf Measurement	51538411
Supervisor, Records Operations	51593026
Supervisor, Resource	51475493
Supervisor, Technical Document Mgmt	51544502
Supervisor, TIMP Engineering	51706029
Suprv, Portable Natural Gas Engineering	51572528
Supvr, Corrective Action Program	51701179
Supvr, Gas Engineering & Design Services	51685645
Supvr, Gas Engineering Support Services	51685637
Supvr, Gas Methods & Procedures Engg	51711340
Supvr, Gas Mpng, Scanning & Attributing	51685714
Supvr, Gas Ops Field Ldr Development	51616443
Supvr, Gas Pgm Plng & Perf Measurement	51646833
Supvr, Gas Projects Controls Distrib	51698866
Supvr, Gas Public Works Coordination	51688986
Supvr, Gas Regulatory Filing Support	51678496
Supvr, Gas System Planning Engineering	51557254
Supvr, Gas Transmission & Distribution	51693206
Supvr, Gas Transmission GIS Mapping	51685715
Supvr, Gas Transm Product Management	51474169
Supvr, Gas Welding Field Coordinator	51636166
Supvr, LNG/CNG Maintenance & Operations	51649056
Technical Project Manager, Expert	50305306



**Chapter 2: DOT-Covered Jobs
Management and Administration Technical Classifications**

Management (continued)

Classification	Classification Code
Technical Project Manager, Principal	50305312
Technical Project Manager, Senior	50305313
Technical Writer	50010680
Technical Writer, Expert	51536797
Technical Writer, Senior	50011102
Utility Operations, Director	50011056



7 Federal Aviation Administration (FAA) Classifications

All classifications listed below are covered under DOT testing guidelines.

Classification	Classification Code
Dispatcher Specialist	50500418
Aviation Scheduler-Assistant	50477319
Aviation Scheduler-Assistant, Senior	50477320
Aviation Scheduler-Assistant, Specialist	50477321
Aviation Scheduler-Assistant, Associate	51541402
Aircraft Mechanic	50010936
Aircraft Mechanic, Associate	51536168
Aircraft Mechanic, Senior	51536169
Aircraft Mechanic, Expert	51644474



Chapter 3: Release and Maintenance of Records

1 Release of Test Results

Employees may request copies of DOT Drug and Alcohol testing records by completing TRAN-FM-054, Release of Test Results Form and submit to the **DOT DrugFree Workplace** mailbox.

2 Record Maintenance and Retention

1. PG&E maintains records of all Non-DOT and DOT drug and alcohol test results. The testing program managed by DOT-RC complies with Title 49 CFR Part §40.
2. PG&E also complies with the record retention requirements as listed below:

Industry	Regulation
FAA – Airline	Title 14 CFR Part §120, Subpart E, Section 120.111 Title 14 CFR Part §120, Subpart F, Section 120.219
FMCSA – Motor Carrier	Title 49 CFR Part §382.401
PHMSA – Pipelines	Title 49 CFR Part §199.227

2.1 FAA Requirements

1. The following records are retained for one year:
 - Negative drug test results (except for pilot records).
 - Alcohol test results less than 0.02 (except for pilot records)
2. The following records are retained for two years:
 - Education and training records
 - Records related to the alcohol and drug collection process
3. The following record is retained for three years:
 - Previous employer records
4. The following records are retained for five years:
 - Annual MIS reports
 - Employee evaluation and referrals to SAPs
 - Follow-up tests and follow-up schedules
 - Refusals to test
 - Alcohol test results 0.02 or greater
 - Verified positive drug test results
 - Employee dispute records
 - Negative drug test results for pilots



- Alcohol test results less than 0.02 for pilots

2.2 FMCSA Requirements

1. The following records are retained for one year:
 - Negative drug test results
 - Alcohol test results less than 0.02
2. The following record is retained for two years:
 - Records related to the alcohol and drug collection process
3. The following record is retained for three years:
 - Previous employer records
4. The following records are retained for five years:
 - Annual MIS reports
 - Employee evaluation and referrals to SAPs
 - Follow-up tests and follow-up schedules
 - Refusals to test
 - Alcohol test results 0.02 or greater
 - Verified positive drug test results
 - EBT calibration documentation
5. Indefinite period: Education and Training records, plus two years after ceasing to perform functions

2.3 PHMSA Requirements

1. The following records are retained for one year:
 - Negative drug test results
 - Alcohol test results less than 0.02
2. The following records are retained for two years:
 - Training records, alcohol only
 - Records related to the alcohol and drug collection process
3. The following records are retained for three years:
 - Previous employer records
 - Training records, drug only



4. The following records are retained for two years:
 - Annual MIS reports
 - Employee evaluation and referrals to SAPs
 - Follow-up tests, and follow-up schedules
 - Refusals to test
 - Alcohol test results 0.02 or greater
 - Verified positive drug test results
 - EBT calibration documentation



Chapter 4: Approved Drug Testing Laboratories and Evidential Breath Testing Devices

1 Overview

Drug testing laboratories certified by the Department of Health and Human Services receive urine specimens and test them to determine the presence of drugs. They also conduct validity testing to determine if the specimen has been adulterated or substituted.

A laboratory located in the U.S. is only permitted to participate in DOT drug testing only if it is certified by HHS under the National Laboratory Certification Program (NLCP) or in the case of a foreign laboratory, if it is approved for participation by the DOT with respect to Title 49 CFR Part §40.

As a reminder, only those laboratories identified under the HHS-Certified Laboratories list are permitted to participate in the DOT drug testing program. HHS-Certified Instrumented Initial Testing Facilities are **not** authorized for use in the DOT drug testing program.

Refer to the Document References section for more information.

2 Approved Alcohol Screening Devices

Alcohol Screening Devices (ASD) and Evidential Breath Testing (EBT) on the NHTSA conforming Products Lists (CPL) for non-evidential and evidential devices respectively are the only devices allowed to be used to conduct alcohol screening tests under Title 49 CFR Part §40.

An ASD that is on the NHTSA CPL for DOT alcohol tests only may be used if there are instructions for its use in this part. An ASD can be used only for screening tests for alcohol, and may not be used for confirmation tests.

Refer to the Document References section for more information.



3 Approved Evidential Breath Testing Devices

Evidential Breath Testing (EBT) devices on the NHTSA conforming products list (CPL) for evidential devices are the only devices used to conduct alcohol confirmation tests under Title 49 CFR Part §40. Note that, among devices on the CPL for EBTs, only those devices listed **without an asterisk (*)** are authorized for use in confirmation testing in the DOT alcohol testing program.

To conduct a confirmation test, an EBT that has the following capabilities must be used:

1. Provides a printed triplicate result (or three consecutive identical copies of a result) of each breath test;
2. Assigns a unique number to each completed test, which the BAT and employee can read before each test and which is printed on each copy of the result;
3. Prints on each copy of the result, the manufacturer's name for the device, its serial number, and the time of the test;
4. Distinguishes alcohol from acetone at the 0.02 alcohol concentration level;
5. Tests an air blank; and
6. Performs an external calibration check.

Refer to the Document References section for more information on approved AST, EBT, laboratories, and collection site audit procedure.



Chapter 5: Drug and Alcohol Collection Process

(This chapter applies to the personnel performing the collection procedures.)

1 Preliminary Steps in the Collection Procedure

Collectors must take the following steps before beginning a collection¹:

1. When a specific time for an employee's test has been scheduled, or the collection site is at the employee's work site, and the employee does not appear at the collection site at the scheduled time, the Collector contacts the DER to determine the appropriate interval within which the DER has determined the employee is authorized to arrive. If the employee's arrival is delayed beyond that time, the Collector must notify the DER that the employee has not reported for testing. In a situation where a C/TPA has notified an owner/operator or other individual employee to report for testing and the employee does not appear, the C/TPA must notify the employee that he/she has refused to test (see Title 49 CFR §40.191(a)(1)).
2. The Collector ensures that, when the employee enters the collection site, the Collector begin the testing process without undue delay. For example, the Collector must not wait because the employee says he/she is not ready or is unable to urinate or because an authorized employer or employee representative is delayed in arriving.
 - a. If the employee is also going to take a DOT alcohol test, the Collector must, to the greatest extent practicable, ensure that the alcohol test is completed before the urine collection process begins.
Example to Paragraph: An employee enters the test site for both a drug and an alcohol test. Normally, the collector would wait until the BAT had completed the alcohol test process before beginning the drug test process. However, there are some situations in which an exception to this normal practice would be reasonable. One such situation might be if several people were waiting for the BAT to conduct alcohol tests, but a drug testing collector in the same facility were free. Someone waiting might be able to complete a drug test without unduly delaying his/her alcohol test. Collectors and BATs should work together, however, to ensure that post-accident and reasonable suspicion alcohol tests happen as soon as possible (e.g., by moving the employee to the head of the line for alcohol tests).
 - b. If the employee needs medical attention (e.g., an injured employee in an emergency medical facility who is required to have a post-accident test), the Collector may not delay this treatment to collect a specimen.
 - c. The Collector must not collect, by catheterization or other means, urine from an unconscious employee to conduct a drug test under this part. Nor may a Collector catheterize a conscious employee. However, a Collector must inform an employee who normally voids through self-catheterization that the employee is required to provide a specimen in that manner.

¹ Title 49 CFR Part §40.61, updated March 22, 2016



**Chapter 5: Drug and Alcohol Collection Process
Preliminary Steps in the Collection Procedure**

- d. If, an employee, normally voids through self-catheterization, and declines to do so, this constitutes a refusal to test.
3. The Collector must require the employee provide positive identification. The Collector must see a photo ID issued by the employer (other than in the case of an owner-operator or other self-employed individual) or a Federal, state, or local government (e.g., a driver's license). The Collector may not accept faxes or photocopies of identification. Positive identification by an employer representative (not a co-worker or another employee being tested) is also acceptable. If the employee cannot produce positive identification, the Collector must contact a DER to verify the identity of the employee.
4. If the employee asks, the Collector must provide his/her identification to the employee. The identification must include the Collector's name and employer's name, but does not have to include the Collector's picture, address, or telephone number.
5. The Collector explains the basic collection procedure to the employee, including showing the employee the instructions on the back of the CCF.
6. The Collector directs the employee to remove outer clothing (e.g., coveralls, jacket, coat, and hat) that could be used to conceal items or substances that could be used to tamper with a specimen. The Collector must also direct the employee to leave these garments and any briefcase, purse, or other personal belongings with the Collector or in a mutually agreeable location. The Collector must advise the employee that failure to comply with your directions constitutes a refusal to test.
 - a. If the employee asks for a receipt for any belongings left with you, the Collector must provide one.
 - b. The Collector must allow the employee to keep his/her wallet.
 - c. The Collector must not ask the employee to remove other clothing (e.g., shirts, pants, dresses, underwear), to remove all clothing, or to change into a hospital or examination gown (unless the urine collection is being accomplished simultaneously with a DOT agency-authorized medical examination).
 - d. The Collector will direct the employee to empty his/her pockets and display the items in them to ensure that no items are present which could be used to adulterate the specimen. If nothing is there that can be used to adulterate a specimen, the employee can place the items back into his/her pockets. An employee must allow the collector to make this observation.
 - e. If, the Collector finds within his/her duties under paragraph (6)(d) of this section, any material that could be used to tamper with a specimen, the Collector will:
 - (1) Determine if the material appears to be brought to the collection site with the intent to alter the specimen, and, if it is, conduct a directly observed collection using direct observation procedures (see Title 49 CFR Part §40.67); or
 - (2) Determine if the material appears to be inadvertently brought to the collection site (e.g., eye drops), secure and maintain it until the collection process is completed and conduct a normal (i.e., unobserved) collection.



7. The Collector must instruct the employee not to list medications that he/she is currently taking on the CCF. (The employee may make notes of medications on the back of the employee copy of the form for his/her own convenience, but these notes must not be transmitted to anyone else.)

2 Procedure before Urine Specimen Collection

The Collector must take the following steps before the employee provides the urine specimen²:

1. Complete Step 1 of the CCF.
2. Instruct the employee to wash and dry his/her hands at this time. The Collector must tell the employee not to wash his/her hands again until after delivering the specimen. The Collector must not give the employee any further access to water or other materials that could be used to adulterate or dilute a specimen.
3. Select, or allow the employee to select, an individually wrapped or sealed collection container from collection kit materials. Either the Collector or the employee, with both parties present, must unwrap or break the seal of the collection container. The Collector must not unwrap or break the seal on any specimen bottle at this time. The Collector must not allow the employee to take anything from the collection kit into the room used for urination except the collection container.
4. Direct the employee to go into the room used for urination, provide a specimen of at least 45 mL, not flush the toilet, and return to the Collector with the specimen as soon as the employee has completed the void.
 - a. Except in the case of an observed or a monitored collection (see Title 49 CFR Parts §40.67 and §40.69), neither the Collector nor anyone else may go into the room with the employee.
 - b. The Collector may set a reasonable time limit for voiding.
5. The Collector must pay careful attention to the employee during the entire collection process to note any conduct that clearly indicates an attempt to tamper with a specimen (e.g., substitute urine in plain view or an attempt to bring into the collection site an adulterant or urine substitute). If the Collector detects such conduct, the Collector must require that a collection take place immediately under direct observation (see Title 49 CFR Part §40.67) and complete Step 2 by noting the conduct in the "Remarks" line of the CCF and the fact that the collection was observed by checking the "Observed" box. The Collector must also, as soon as possible, inform the DER and collection site supervisor that a collection took place under direct observation and the reason for doing so.

² Title 49 CFR Part §40.63, updated March 22, 2016



3 Urine Collection Procedures

Collectors and operators of collection sites must take the steps listed in this section to prevent unauthorized access that could compromise the integrity of collections.

The Collector must do the following before each collection to deter tampering with specimens:

1. Secure any water sources or otherwise make them unavailable to employees (e.g., turn off water inlet, tape handles to prevent opening faucets);
2. Ensure that the water in the toilet is blue;
3. Ensure that no soap, disinfectants, cleaning agents, or other possible adulterants are present;
4. Inspect the site to ensure that no foreign or unauthorized substances are present;
5. Tape or otherwise secure shut any movable toilet tank , or put bluing in the tank;
6. Ensure that undetected access (e.g., through a door not in your view) is not possible;
7. Secure areas and items (e.g., ledges, trash receptacles, paper towel holders, and under-sink areas) that appear suitable for concealing contaminants; and
8. Recheck items in paragraphs (1) through (7) of this section following each collection to ensure the site's continued integrity.

If the collection site uses a facility normally used for other purposes, like a public rest room or hospital examining room, the Collector must also ensure before the collection that:

1. Access to collection materials and specimens is effectively restricted;
2. The facility is secured against access during the procedure to ensure privacy to the employee and prevent distraction of the collector. Limited-access signs must be posted.

The Collector must take the following additional steps to ensure security during the collection process:

1. To avoid distraction that could compromise security, the Collector is limited to conducting a collection for only one employee at a time. However, during the time one employee is in the period for drinking fluids in a “shy bladder” situation (Chapter 12, Section 3), the Collector may conduct a collection for another employee.
2. To the greatest extent the Collector can, keep an employee's collection container within view of both the Collector and the employee between the time the employee has urinated and the specimen is sealed.
3. The Collector is responsible for ensuring the Collector is the only person in addition to the employee who handles the specimen before it is poured into the bottles and sealed with tamper-evident seals.
4. In the time between when the employee gives the Collector the specimen and when the specimen is sealed, the Collector must, remain within the collection site.
5. Maintain personal control over each specimen and CCF throughout the collection process.



**Chapter 5: Drug and Alcohol Collection Process
Urine Collection Procedures**

Collectors operating a collection site, must implement a policy and procedures to prevent unauthorized personnel from entering any part of the site in which urine specimens are collected or stored.

1. Only employees being tested, collectors and other collection site workers, DERs, employee and employer representatives authorized by the employer (e.g., employer policy, collective bargaining agreement), and DOT agency representatives are authorized persons for purposes of the above paragraph.
2. Except for the observer in a directly observed collection or the monitor in the case of a monitored collection, the Collector must not permit anyone to enter the urination facility in which employees provide specimens.
3. Collectors must ensure that all authorized persons are under the supervision of a collector at all times when permitted into the site.
4. The collector may remove any person who obstructs, interferes with, or causes a delay in the collection process.

Collectors must minimize the number of persons handling specimens.³

³ Title 49 CFR Part §40.43, updated on March 21, 2016



4 Direct Observation Procedure

The Direct observation procedure⁴ is stated below:

1. The observer must request the employee to raise his/her shirt, blouse, or dress/skirt, as appropriate, above the waist; and lower clothing and underpants to show the observer, by turning around, that they do not have a prosthetic device. After the observer determines that the employee does not have such a device, the observer may permit the employee to return clothing to its proper position for observed urination.
2. The observer must watch the employee urinate into the collection container. Specifically, the observer watches the urine go from the employee's body into the collection container.
3. As the observer but not the collector, the observer must not take the collection container from the employee, but the observer must observe the specimen as the employee takes it to the collector.
4. When someone else has acted as the observer, the collector must include the observer's name in the "Remarks" line of the CCF (Step 2).
5. If the employee declines to allow a directly observed collection required or permitted under Chapter 5 Section 4 to occur, this is a refusal to test.

⁴ Title 49 CFR Part §40.67



5 Alcohol Testing Procedures

Alcohol testing is performed by a Breath Alcohol Technician (BAT) or a Screening Test Technician (STT). An evidential breath testing (EBT) machine or an Alcohol Screening Device (ASD) is used to collect and analyze breath samples for any alcohol content. Results are read immediately. A screening test is given first; if results are greater than 0.02, a confirmation test is performed. One individual will be tested at a time and the BAT/STT shall not leave the testing area. The procedures for a breath alcohol test are as follows:

5.1 General

1. The BAT explains testing process and completes Step 1 on the Federal Alcohol Testing Form (ATF). The individual completes Step 2 on form and signs the certification form.

Note: Refusal to sign the certification is regarded as a refusal to take the test. The BAT opens an individually sealed mouthpiece in view of the person and attaches it to the EBT. The individual blows forcefully into the mouthpiece for at least six seconds or until the EBT gives the signal to stop. The BAT shows the results of the test to the employee. If results are less than 0.02, the BAT dates the testing form and signs the certification in Step 3. Step 4 is completed by the employee only if the test result is 0.02 or higher.

2. If results are 0.02 or greater, a confirmation test must be performed. Prior to conducting the confirmation test, a waiting period of at least 15 minutes and not more than 30 minutes is observed. The BAT instructs the individual not to eat, drink or put any object or substance in his/her mouth and, to the extent possible, not belch during the waiting period. However, the test will be conducted even if these instructions are disregarded. A new mouthpiece is used for the confirmation test. Before confirmation testing begins, the BAT ensures that the EBT registers 0.00, if it does not register 0.00, testing must be done on another approved instrument. After the confirmation test is completed the employee is shown the readout of the results. **Note:** If confirmation results are 0.02 or greater, DER is notified immediately, the BAT signs step 3 and has the employee sign step 4 (If the employee refuses to sign step 4 the BAT will note this in the remarks section. This is not a refusal to test). If the test result printed by the EBT does not match the displayed result or if a sequential test number printed by the EBT does not match the sequential test number displayed by the EBT prior to the confirmation test, the BAT shall note the disparity in the "Remarks" section of the testing form. Both the BAT and the individual shall initial and sign the notation. The test is considered invalid and the employee is so advised.



5.2 Reasons for Cancelled Alcohol Tests

An alcohol test shall be invalid under the following circumstances:

1. A device other than an EBT as described in DOT is used for the test (See the Document References section).
2. The next external calibration of an EBT produces a result that differs by more than the tolerance stated in the manufacturer's Quality Assurance Plan (QAP) from the known value of the test standard. In this event, every test result of 0.02 or above obtained on the device since the last valid external calibration check shall be invalid.
3. The BAT does not observe the 15-minute waiting period prior to a confirmation test.
4. The BAT does not perform an air blank before the screening or confirmation test, which results in a reading of 0.00.
5. The BAT does not print and sign his/her name on the BATF as required, or the BAT fails to note on the form that the individual has failed or refused to sign the form as required.
6. An EBT fails to print a confirmation test result, or the sequential test number or alcohol concentration displayed on the EBT is not the same as the sequential test number or alcohol concentration on the printed result.
7. The BAT does not perform an air blank of the EBT before a screen or confirmatory test, or an air blank does not result in a reading of 0.00 prior to the administration of the test.

5.3 Screen Tests

The screen test will be given with an EBT or ASD (alcohol screening device). If an EBT or evidential breath testing device is used, an individually wrapped mouthpiece will be selected by the BAT/STT or the employee. The mouthpiece will be attached to the device, and the employee will be instructed to blow forcefully into the mouthpiece for six seconds, or until the device indicates that a sufficient amount of breath has been obtained. The displayed result will be shown to the employee. The test results will be recorded on the ATF.

1. If a saliva ASD is used for the screen test, the STT/BAT will check the expiration date on the device and show it to the employee. The package will be opened in the presence of the employee, and the STT/BAT will offer the device to the employee, instructing him/her to insert it into his/her mouth until it becomes saturated with saliva. If the test does not activate, or the employee chooses not to use the device, the STT/BAT will insert the device into the employee's mouth.
2. If the result of the screen test is an alcohol concentration of less than 0.02, no further testing is required, and the BAT/STT will report the result to the DER as a negative test. If the result of the screen test is an alcohol concentration of 0.02 or greater, a confirmation test must be performed **ONLY** with an EBT device and only by a BAT.



5.4 Confirmation Test

The confirmation test must be conducted at least 15 minutes, but not more than 30 minutes, after the completion of the screen test. This delay prevents any accumulation of alcohol in the mouth from leading to an artificially high reading, as any residual amount of alcohol left in the mouth will dissipate prior to the confirmation test.

1. At the conclusion of the screen test before the confirmation test, the BAT/STT will inform the employee of the need to conduct a confirmation test and instruct the employee not to eat, drink, or put any object or substance in his/her mouth. The BAT/STT will also instruct the employee not to belch to the extent possible while awaiting the confirmation test. The BAT/STT (Screen Test Technician) must inform the employee why the waiting period is needed and that while it is in the employee's best interest to follow the instructions, the test will be conducted at the end of the waiting period, even if they are disregarded.
2. If more than 30 minutes have elapsed since the time of the screen test, the cause for the delay must be documented, but the test remains valid.
3. Before the confirmation test is administered, the BAT shall conduct an air blank on the EBT in the presence of the employee, If the reading is greater than 0.00, the BAT shall conduct one more air blank. If the second air blank reading is greater than 0.00, the EBT must not be used to conduct the test.
4. The confirmation test is conducted using the same procedures as the screening test. A new mouthpiece will be used and inserted into the EBT.
5. The employee will be instructed to blow forcefully into the mouthpiece for at least 6 seconds, or until the device indicates it has an adequate breath sample. The result on the display must be shown to the employee. The result and unique test number that the EBT prints out must also be shown to the employee.
6. The BAT will sign and date the form. If the test result is less than 0.02, the test is over, the employee will be given his/her copy of the ATF, the collector will get the Employer copy to the DER and the employee will be dismissed. If the test result is 0.02 or above, the BAT will instruct the employee to sign and date the certification statement on Step 4 of the ATF (It is not a refusal to test if the employee refuses to sign Step 4 of the ATF). The BAT will immediately transmit the results directly to the DER so the employee can be immediately removed from safety-sensitive duties. The BAT will attach the alcohol test result printout directly onto each ATF copy with tamper evident tape (unless the results are printed directly on the form).
7. If the initial and confirmatory test results are different, the confirmation test result is deemed to be the final result. An employer cannot take action against an employee under these regulations for a positive screen test (i.e., 0.040 or greater) when the confirmatory test result is negative (i.e., less than 0.02). If the alcohol test is positive, the employer should make arrangements to drive the employee from the collection site to avoid liability.



8. The BAT and/or STT will transmit all results to the DER confidentially (in writing, in person, by telephone, or other electronic means). In the event an individual must be removed from safety-sensitive duties (0.02 or above or test refusal), the BAT will notify the DER immediately. The EBT will produce a printout of the test results in triplicate or print three consecutive identical copies of the results. The three copies of the printout will be attached to each of the three copies of the ATF. Copy 1 must be retained by the BAT, Copy 2 must be provided to the employee, and Copy 3 must be transmitted to the employer.



Chapter 6: Pre-Employment/Pre-Duty Testing

1 Guidelines for Pre-Employment/Pre-Duty Testing

A DOT pre-employment drug test must be conducted before an individual is hired or contracted and when an employee is transferred / promoted from a non-covered to a DOT-covered position, and when an employee is on inactive status for 30 or more days. Inactive status is defined by a status change that generates a PCR (Personnel Change Request). This includes when an employee transfers back and forth from a covered position to a non-covered position and back again (i.e., going in and out of the DOT Drug and Alcohol Testing Program's random pools), and when an employee is upgraded to a covered position. This also applies to employees returning from a leave of absence who have not been participating in the program (e.g. subject to the random selection process). A negative test result is required prior to performing covered functions.

1. DOT-RC/Recruiting will coordinate the collection testing process.
2. The DER will ensure the collection site facility is provided with the following:
 - a. Federally Mandated Custody and Control Form
 - b. Supplies related to urine samples (caps from-vials, evidence tape, labels for sample vials, mailer cartons, optional plastic bags for sample vials) and a postage-paid courier envelope(s) for transportation of samples to the laboratory will have been supplied to the contracted collector ahead of time
3. Employees who are wishing to transfer or bid from a non-covered position to a DOT-covered position will be required to take and pass the DOT pre-employment drug test. This testing will occur when the job offer is extended and must be completed within 30 days of the actual start date, but prior to performing any covered functions.
4. Employees already in a covered position transferring to another covered position are not required to take the DOT pre-employment drug test.
5. Transfer employees who test negative will be notified therefore the transfer process can be concluded. The notification of negative results will be handled by the MRO's office through the DER.
6. Transfer employees who test confirmed positive will be contacted by the MRO to discuss results.
7. MRO will inform the DER of a verified positive result. The transfer request at this time would be rejected due to the employee testing positive.
8. Transfer employees who test positive will be required to complete an education and/or treatment program, return-to-duty test, and follow-up testing recommended by EAP. This will not be considered as a first time positive test under the DOT First Time Violator policy.
9. A second positive test when the employee is not in a covered position will put the employee in the non-DOT First Time Violator Program.
10. Employees who test positive the first time during a transfer request will be returned to their existing position upon authorization by the EAP. This could be during their education and/or treatment program. Followed by a negative Return to Duty test(s).



**Chapter 6: Pre-Employment/Pre-Duty Testing
Guidelines for Pre-Employment/Pre-Duty Testing**

11. An employee who tests positive during a subsequent attempt to transfer into a covered position or after they have already been awarded a job and are in a covered position, will be considered to have two verified positive tests and will be discharged.
12. Employees, who after a verified positive, transfer from a covered position and then return to a covered position will be reinstated in the DOT First Time Violator Program and be subject to unannounced follow-up testing up to a cumulative total of five years from the date reinstated to a covered position, as recommended by the original SAP/EAP. They will also be required to take a DOT pre-employment drug test and receive a negative result if they have been out of the covered pool for more than 30 days.
13. For purposes of this section, "transfers" include employees bidding, or being demoted or displaced into a covered position.



Chapter 7: Random Testing

1 Guidelines for Random Drug Testing

The primary purpose of random testing is to deter prohibited drug use and to ensure a drug free workplace.

DOT regulations require that covered employees shall be subject to drug testing on an unannounced and random basis. The Company shall conduct a number of tests equal to at least the percentage set by the DOT of all covered employees each calendar year, spread reasonably over a 12-month period.

1.1 Key Aspects of the Random Testing Selection Process

1. Active employees remain in the random selection pool at all times, regardless of whether or not they have been previously selected for testing.
2. Employees are selected for testing by using a computer-based random number generator (an equivalent random selection method that is matched with an employee's social security number or employee ID number).
3. Employees selected for random testing may be tested before, during, or immediately following safety sensitive duties.
4. If an employee is unavailable for testing, a supervisor must notify the DER immediately so that the test can be rescheduled.
5. The test must be completed prior to the next random selection draw or the employee will not be tested.
6. Employees are selected for random testing based on the number of covered employees at the time and the necessary testing rate.
7. Specimen collection is conducted on different days of the week throughout the annual cycle.

1.2 Steps for Random Testing

1. On a pre-determined date, the DER shall use the random selection procedures to compile a list of covered employees selected for random testing during that testing cycle.
2. The DER ensures that the list of social security numbers or employee identification numbers identifies the correct employees to be randomly tested during the testing cycle.
3. The selections are grouped by site, classification, and employee name.
4. The monthly list of employees to be tested is sent confidentially to the contracted specimen collector. The collector is given the name of a Company Representative to contact at each site.
5. The contracted specimen collector notifies the appropriate immediate supervisor(s) no more than three days prior to the date of collection when employees under their supervision have been selected for a random drug test.



6. Employees are notified of their selection for random testing on the collection date after they report for duty.
7. The list of employees selected is retained by the DER or designee in a secure location.

1.3 Notification of Employees

1. The employee will not be notified of the test until after reporting for duty on the collection date.
2. The appropriate management personnel will notify the employee to be tested to report to the collection site at a specified time.
3. Employees must immediately report to the collection site within 30 minutes, plus travel time, once notified by the appropriate management personnel.
4. Each employee selected for testing must be tested during the selection period.⁵

1.4 Random Drug Screen Checklist for Employees

1. Your supervisor or an appointed Designee will notify you that you have been selected for a drug test. You will need to immediately report to the collection site. You must provide a photo ID or company ID to the collector. Your supervisor or an appointed Designee may verify your identification to the Collector if you do not have a picture ID available.
2. You are not permitted to leave the collection site until the collection process is completed. If you leave the site, it will be considered a refusal to test, which is considered to be a verified positive result. The Collector will inform you when you are permitted to leave the collection site.
3. Failure to cooperate, including failure to sign the Federal Custody and Control Form will result in disciplinary action or termination of your employment.
4. Failure to cooperate with any part of the testing process (e.g. refusing to empty pockets when so directed by the collector, behave in a confrontational manner that disrupts the collection process) is considered a refusal to test.
5. If you alter, tamper with, or substitute the test specimen, *your employment will be terminated*; this is a refusal to test.
6. You will be asked to remove all outer garments and leave your personal belongings, except wallet, with the Collector. You may retain your wallet.

⁵ Title 49 CFR Parts §382.305 (i) (3) and §199.105 (c)



7. You will be asked to display the contents of your pockets and display the items to the Collector. If any items appear to have been brought to the collection site with the intent to adulterate a specimen, you will be required to submit to an immediate observed collection. If nothing is there that can be used to adulterate a specimen, then you may place the items back into your pockets and the collection procedure will continue. If you refuse to empty your pockets, this is considered a refusal to cooperate with the testing process that is considered to be a verified positive test.
8. You will be asked to wash and dry your hands.
9. You will be allowed to choose one sealed collection kit. You may unwrap it yourself.
10. You will be asked to provide a specimen of at least 45 milliliters, and directed not to flush the toilet. If you cannot provide enough specimen you may drink up to 40 ounces of coffee or other liquids available in the waiting area. After three hours, if you are still unable to provide a specimen, you will be removed from work with permission, without pay within five business days, the employee must attend an evaluation with a licensed physician, that is acceptable to the MRO, who has expertise in the medical issues raised by the employee's failure to provide a sufficient specimen. (The MRO may perform this evaluation if the MRO has appropriate expertise.) *The Company will inform the employee of the location and date/time of the appointment take inconsideration of work schedule and physician schedule.*
11. If you produce a specimen of at least 45 milliliters, you will be asked to verify that the specimen temperature box is checked on the Custody and Control Form by the Collector within four minutes of handing it to the Collector.
12. In your presence, the specimen will be split between the two specimen bottles.
13. Your specimen will remain in full view until sealed in the bottles.
14. You will be asked to initial both sealed bottles.
15. You will be asked to complete the Custody and Control Form after the specimen has been sealed.
16. Provide your daytime/evening telephone number.
17. Both bottles will be bagged and sealed in your presence.
18. Once both bottles are bagged and sealed, the process is complete, the Collector will hand you your copy of the collection form and inform you that you may leave the collection site.
19. If you have a non-negative test result, you will be contacted by the MRO to discuss the result. You will be given an opportunity to provide a medical explanation. The MRO will confirm any prescriptions or medical history that might have affected the test. If you have a verified positive test result, you will be removed from work and referred to a Substance Abuse Professional (SAP) for an evaluation. *You must contact the SAP within three days of the verified positive test result. Failure to contact the SAP within three days is considered non-compliance and will subject you to termination of your employment.*



2 Guidelines for Random Alcohol Testing

1. Random alcohol testing is applicable to CDL pool employees (commercial driver's license holders).
2. Gas pool employees are not subject to random alcohol testing.
3. Random alcohol testing shall be conducted in accordance with the following requirements:
 - a. Random alcohol testing shall be administered at the minimum annual percentage rate of the pool set forth by the Department of Transportation.
 - b. The employer shall ensure that random alcohol tests are unannounced and spread reasonably throughout the calendar year.
 - c. The employer shall ensure that drivers selected for random alcohol tests proceed immediately to the testing site upon notification of being selected.
 - d. A driver may only be tested for alcohol while the driver is performing safety-sensitive functions, just before the driver is to perform safety-sensitive functions, or just after the driver has ceased performing safety-sensitive functions. Performing a safety-sensitive function is defined as any period in which the driver is actually performing, ready to perform, or immediately able to perform any safety-sensitive function.
 - e. In the event that a driver is selected for a random alcohol test and is on vacation, sick leave, or an extended medical absence, the immediate exempt supervisor will report back to the DER that the individual selected was unavailable for testing.
 - f. The test must be completed prior to the next random selection draw or the employee will not be tested.

2.1 Random Alcohol Screen Checklist for Employees

1. Your supervisor or an appointed Designee will notify you that you have been selected for an alcohol screen. You will need to immediately report to the collection site.
2. You are not permitted to leave the collection site until the collection process is completed. If you leave the site, it will be considered a refusal to test, which is considered to be a verified positive result. The Collector will inform you when you are permitted to leave the collection site.
3. Failure to cooperate with any part of the testing process (e.g., confrontational behavior that disrupts the collection process is considered a refusal to test which is considered a positive test result).
4. You will be asked to present a picture ID to the Collector. Your supervisor or an appointed Designee may verify your identification to the Collector if you do not have a picture ID available.
5. You will be asked to complete the required paperwork.
6. You will be asked to blow forcefully into the testing machine until instructed to stop.



7. You will then be shown the results of the test.
8. If the test result is below 0.02, you will be given a copy of the testing form and released to return to duty.
9. If the test result is equal to or greater than 0.02, you will be given a confirmation test.
10. You will be asked to wait 15 minutes prior to the administration of the confirmation test to allow any residual alcohol to evaporate.
11. You will then be asked to again blow forcefully into the testing machine until instructed to stop.
12. If the confirmation test result is below 0.02, you will be given a copy of the testing form and released to return to duty.
13. If the result is 0.02 or greater, your DER will be notified immediately. You will need to remain where you are at the testing site until your supervisor gives you directions on how to proceed.
14. If test result is 0.02 to 0.039, you will be removed from work for at least 24 hours before your next scheduled shift.
15. If the test result is 0.04 or greater, you will be removed from work and referred to a Substance Abuse Professional (SAP) for an evaluation. *You must contact the SAP within 3 days of the positive test result. (Failure to contact the SAP within three days is considered non-compliance and will subject you to termination of employment.)*
16. If the individual is still unable to provide a sufficient breath specimen, the BAT may attempt to operate the EBT in manual mode, or they may use a saliva ASD, if available. If attempts are still unsuccessful, the BAT/STT will contact the DER and note the insufficient volume on the ATF. The employee will be removed from work with permission, without pay until the results of a medical evaluation are obtained. Within five business days, the employee must attend an evaluation with a licensed physician, that is acceptable to the MRO, who has expertise in the medical issues raised by the employee's failure to provide a sufficient specimen. (The MRO may perform this evaluation if the MRO has appropriate expertise.) *The Company will inform the employee of the location and date/time of the appointment take inconsideration of work schedule and physician schedule.*



3 Random Drug or Alcohol Screen Checklist for Supervisors

1. Some of your employees have been identified for random drug and/or alcohol testing. Please read this checklist to familiarize yourself with the collection process.
2. DER or the Contract Specimen Collector will notify you up to five days in advance of the test date and the names of your employees that have been selected for drug and/or alcohol testing.
3. This information is confidential and must not be shared with employees prior to the test date. Disclosure of this information prior to the test date is prohibited by regulations and will subject you to termination.
4. If the employee is not available on the test date, inform the DER or Contract Specimen Collector immediately.
5. The following procedures should be followed in notifying employees of the collection process. Also see the attached “Checklist for Employees” that will be given to your randomly selected employees.
6. Approximately 15–30 minutes prior to the actual collection, but no sooner than two hours, inform the employee verbally, that he/she has been identified through a random selection process for drug and/or alcohol testing. Clearly inform the employee as to the time and the exact location to report for testing and instruct him/her to take photo identification to the collection site. Once notified the employee **MUST** test or it is a refusal to test which is treated the same as a positive test.
7. An employee not identified on the official test list cannot be tested.
8. A contracted collector will follow the process outlined by the federal regulations to perform the actual specimen collection. Advise employees to be prepared to provide a urine and/or breath specimen at the scheduled collection time.
9. When an employee selected for random testing is unavailable for testing for a legitimate reason (e.g. working different shift, travel, or leave), you must inform the DER, who will annotate the random test list to indicate the reason for that employee not being tested. Once a facility has been notified of testing, any leave requests submitted by employees for the testing day should be carefully scrutinized.
10. Immediately report any problems encountered during employee notification to the DER. Employees who willfully fail to cooperate with the collection procedures will be subject to disciplinary actions consistent with the Company’s Drug Testing policy. The DER will be able to address the problem with the employee (e.g., refusal to test).
11. If an employee who is notified to report for testing is unable to provide a sufficient quantity of urine and/or breath, either the collector or DER will notify you.



12. During the drug test, the employee will be given a reasonable period of time to provide a urine specimen (maximum three hours). During this time, the employee **MUST** remain at the collection site and will be instructed that he/ she may drink at least eight ounces of liquid as supplied by the contractor. If at the end of the waiting period the employee still cannot provide a specimen, the collector will notify the DER and the employee will be removed from work and within five business days, the employee must attend an evaluation with a licensed physician, that is acceptable to the MRO, who has expertise in the medical issues raised by the employee's failure to provide a sufficient specimen. (The MRO may perform this evaluation if the MRO has appropriate expertise.) *The Company will inform the employee of the location and date/time of the appointment take inconsideration of work schedule and physician schedule.*
13. If the employee refuses to provide a test specimen or refuses to follow the specimen collection procedures, *his/her action will be treated as insubordination and the employee will be suspended from work.* In addition, it is a refusal to test under DOT regulations and it will be treated as a verified positive test. The employee will be required to cooperate with his/her assigned Substance Abuse Professional and follow the SAP's treatment recommendations. *If the employee fails to cooperate with the SAP and his/ her recommendations, the employee's failure to cooperate is considered a second verified positive test and the employee is subject to termination of his/her employment.*
14. If the employee willfully tampers with or alters the test specimen *he/she is considered non-compliance and will subject you to termination of your employment.*
15. See Chapter 1 Section 1.4 of this Plan when a union member must be offered a shop steward as part of the DOT process.



Chapter 8: Reasonable Suspicion Testing

1 Guidelines for Reasonable Suspicion/Cause Testing

The DOT regulations require a covered safety-sensitive employee to submit to a test when the employer has reasonable suspicion that the employee has used a prohibited drug or has misused alcohol. The request to undergo a reasonable suspicion test must be based on specific, contemporaneous, articulable observations concerning the appearance, behavior, speech, or body odor of the covered safety-sensitive employee.

1. A supervisor or designee who has completed the required behavioral observation training in making reasonable suspicion determinations, who suspects drug use by an employee, shall require the employee to submit to a controlled substances test when the supervisor or designee has reasonable suspicion to believe that the employee has violated the prohibitions outlined in Chapter 1, Section 4 of this policy. If a second exempt supervisor or designee is available at the site, a second observation will be made. (For PHMSA it MUST be two supervisors or designee, see below) Prior to requiring an employee to submit to a reasonable suspicion test, the supervisor shall contact the DER or the DER's designee and obtain concurrence to test (The concurrence to test must be made by two supervisors or designee; MUST have two supervisors or designee concur with observations that led to test, one MUST be trained 60 minutes drug/60 minutes alcohol-PHMSA⁶).
2. The supervisor or designee determination that reasonable suspicion exists must be based on specific, contemporaneous, articulable observations concerning the appearance, behavior, speech or body odors of the employee. The observations may include, but are not limited to, indications of the chronic and withdrawal effects of controlled substances.
3. The employee's immediate supervisor or designee will contact the DER to make arrangements for the reasonable suspicion/cause test.
4. The DER will make the necessary arrangements with the designated collection site facility and will notify the immediate supervisor or designee of the time and place the employee must report to for testing. (Testing must take place within two hours of observed behavior, if not tested it must be documented why the test was not performed/if not tested within eight hours of observed behavior supervisor or designee must cease all attempts to test and document why test was not administered-for alcohol suspicion). See Title 49 CFR Parts §199.225 and §382.307.
5. A supervisor or designee will accompany the employee to the collection site facility.
6. The supervisor or designee shall remove the employee from safety sensitive duties pending the test result.

⁶ TECH-0049 WBT DOT Compliance Training for Supervisors
TECH-0049 Instructor-Led DOT Compliance Training for Supervisors



**Chapter 8: Reasonable Suspicion Testing
Guidelines for Reasonable Suspicion/Cause Testing**

7. If an employee refuses to be tested, it will be considered a verified positive test and the supervisor or designee will take immediate steps to remove the employee from work. The employee will be subjected to the DOT requirements for return to duty after a verified positive and be subjected to discipline or termination of employment.



Chapter 9: Post-Accident and Post-Incident Testing

1 Guidelines for Post-Accident Testing

1.1 CDL Employees (FMCSA)

An accident involving a regulated commercial motor vehicle is defined as an occurrence involving a commercial motor vehicle operating on a public road in commerce⁷. Each employer shall test for alcohol and controlled substances each surviving driver provided the following criteria are met⁸:

1. The surviving driver was performing DOT safety-sensitive functions with respect to the vehicle, if the accident involved the loss of human life; **or**
2. The surviving driver receives a citation within 32 hours of the occurrence under State or local law for a moving traffic violation arising from the accident, if the accident involved:
 - a. Bodily injury to any person who, as a result of the injury, immediately receives medical treatment away from the scene of the accident; **or**
 - b. One or more motor vehicles incurring disabling damage as a result of the accident, requiring the motor vehicle to be transported away from the scene by a tow truck or other motor vehicle.

⁷ TRAN-2001S Commercial Driver Standard, TRAN-2005S Drug and Alcohol Testing Standard, TRAN-2041S Post-Accident Testing Standard, and TRAN-2041P-01 Post-Accident Testing Procedure

⁸ Title 49 CFR Part §382.303



**Chapter 9: Post-Accident and Post-Incident Testing
Guidelines for Post-Accident Testing**

A DOT Drug & Alcohol Test is Required When There is...	A DOT Drug & Alcohol Test is NOT Required When There is...
1. Human fatality	1. No human fatality and no citation issued
2. Bodily injury requiring medical treatment away from the scene <u>plus</u> a moving violation citation issued within 8 hours of the accident (Drug & Alcohol Testing)	2. Bodily Injury requiring medical treatment away from the scene, but no citation was issued to the commercial driver
3. Bodily Injury requiring medical treatment away from the scene <u>plus</u> a moving violation citation issued within 32 hours of the accident (Drug Test Only)	
4. Disabling damage to any motor vehicle requiring a vehicle to be towed <u>plus</u> a moving violation citation issued within 8 hours of the accident (Drug & Alcohol Testing)	3. Disabling damage to any motor vehicle requiring a vehicle to be towed, but no citation was issued to the commercial driver
5. Disabling damage to any motor vehicle requiring a vehicle to be towed <u>plus</u> a moving violation citation issued within 32 hours of the accident (Drug Test Only)	



1.2 Gas Employees (PHMSA)

Post-Accident Drug and Alcohol testing is required when there is an “incident” or an “accident” on a pipeline⁹.

Incident: means any of the following events¹⁰:

1. An event that involves a release of gas from a pipeline; **and**
 - a. A death, or personal injury necessitating in-patient hospitalization; **or**
 - b. Estimated property damage of \$50,000 or more, not including cost of gas loss of the operator or others.
 - c. Unintentional estimated gas loss of three million cubic feet or more;
2. An event that is significant, in the judgment of the operator, i.e. management investigative personnel, even though it did not meet the criteria noted above.
3. An event that results in an emergency shutdown of an LNG facility

Accident means an incident reportable under Title 49 CFR Part §191 of this chapter involving gas pipeline facilities or LNG facilities, or an accident reportable under Title 49 CFR Part §195 of this chapter involving hazardous liquid pipeline facilities.

“Reportable Accident” means any of the following events:

An accident report is required for each failure in a pipeline system subject to this part in which there is a release of the hazardous liquid or carbon dioxide transported resulting in any of the following:

1. Explosion or fire not intentionally set by the operator.
2. Release of 5 gallons (19 liters) or more of hazardous liquid or carbon dioxide, except that no report is required for a release of less than 5 barrels (0.8 cubic meters) resulting from a pipeline maintenance activity if the release is:
 - a. Not otherwise reportable under this section;
 - b. Not one described in Title 49 CFR Part §195.52(a)(4);
 - c. Confined to company property or pipeline right-of-way; and
 - d. Cleaned up promptly;
3. Death of any person;
4. Personal injury necessitating hospitalization;

⁹ Title 49 CFR Parts §199.3, §191.3, §195.5, and §195.52

¹⁰ TRAN-2005S Drug and Alcohol Testing Standard, TD-4413S Gas Event Reporting Standard, and TD-4413P-04 Gas Event Reporting Procedure



**Chapter 9: Post-Accident and Post-Incident Testing
Guidelines for Post-Accident Testing**

5. Estimated property damage, including cost of clean-up and recovery, value of lost product, and damage to the property of the operator or others, or both, exceeding \$50,000.

1.3 Time

Elapsed	Action Required
2 hours	If the employee has not submitted to an alcohol test before this time, the management personnel/supervisor shall prepare and maintain on file a record stating the reason the test was not promptly administered. Attempts to administer post-accident alcohol test continue.
8 hours	Cease attempts to administer alcohol test, and prepare and maintain another record the same as described above. Continue with attempts to administer controlled substance test as provided by DOT regulations.
32 hours	If the employee has not submitted to a controlled substance test at this time, the employer shall cease attempts to administer the test, and prepare and maintain the record described above.



Chapter 10: Self-Identification

1 PG&E's Voluntary Self-Identification Policy for DOT-Covered Employees

Employees in DOT-covered positions who admit to alcohol misuse or controlled substances use will not be subject to disciplinary action for self-identification, and are not subject to the federally mandated referral, evaluation and treatment requirements, provided that:

- The employee does not self-identify in order to avoid testing.
- The admission of alcohol misuse or controlled substances use is made prior to performing safety sensitive functions.
- Self-identification is not permitted on the day of any DOT test.
- Self-identification occurs more than 72 hours prior to a scheduled DOT test.

Self-identification occurs when an employee contacts an Employer Substance Abuse Professional (EAP), Fitness for Duty (FFD), DER, or the Supervisor¹¹ to inform them that the employee has misused alcohol or used controlled substances, fully disclosing the circumstances, scheduling an evaluation with EAP, and timely and fully complying with the recommendations made by EAP for education and/or treatment. An employee who has self-identified is required to successfully complete an educational and/or treatment program, as determined by EAP. The employee must also execute a "Voluntary Self-Identification Return to Duty Agreement for DOT-covered Employees" with EAP, acknowledging the employee must fully comply with all EAP's recommendations or be subject to termination of his/ her employment, and have a Negative DOT Return to Duty drug and/or alcohol test(s) (FMCSA) or non-DOT Return to duty test(s) (PHMSA). Full compliance with EAP's recommendations must occur within 72 hours of receipt of the recommended education and/or treatment plan or the employee will be subject to termination of employment.

To participate in the Self-Identification program, an employee currently in the DOT First Time Offender's Program must contact his/her EAP counselor and fully disclose the circumstances of the employee's relapse, and timely and fully comply with any recommendations made for additional counseling or treatment. Full compliance with EAP's recommendations must occur within 72 hours of receipt of the recommended education and/or treatment plan or the employee will be subject to termination of employment.

Employees who self-identify will be removed from duty and not be permitted to return to duty until EAP determines that they have successfully completed the recommended education and/or treatment program and have undergone a DOT return to duty test(s) (FMCSA)¹² or non-DOT Return to Duty test(s) (PHMSA) with a result indicating an alcohol concentration of less than 0.02 and/or a verified negative test result for controlled substances. An employee with a result indicating an alcohol concentration of less than 0.02 and/or a verified negative test result for controlled substances will be permitted to return to a DOT-covered position. A verified positive result on a return to duty test will be considered a DOT drug testing violation. This will subject the employee to the First offender policy and will require further rehabilitation. If the employee tests positive on his/her subsequent return to duty

¹¹ FFD (925) 459-3603 external and (510) 684-5625 cell

¹² Under Direct Observation (415) 412-1921 cell



test, the employee will be discharged. Upon return to duty, the employee is subject to EAP monitoring and up to six unannounced non-DOT follow-up tests during the subsequent 12 months.

The Company will provide employees with one opportunity to self-identify under this policy during a 60-month period from the date of self-identification.



2 Voluntary Self-Identification Return-to-Duty Agreement for DOT-Covered Employees

The voluntary self-identification return-to-duty agreement is shown below¹³:

I, _____, understand that the Company has given me an opportunity for rehabilitation following my voluntary admission of alcohol abuse and/or controlled substance use and has agreed to allow me to return to duty following compliance with EAP's recommendations.

I understand that this Recovery Agreement:

- Does not guarantee employment.
- Does not exempt me from meeting other job requirements.
- Does not interfere with my employer's right to discipline or terminate my employment for other violations or infractions

I understand and agree to abstain from all mood altering substances, both alcohol and drugs. I will not drink any beverage containing alcohol or ingest, smoke, snort or inject any drugs. I agree that I will not take any medication unless prescribed by a physician or a dentist who I have informed of my chemical dependence and the safety-sensitive nature of my job. I also will not exceed the dosage recommended by my physician for such medication. I understand that I am to report all prescriptions to my EAP Counselor within 24 hours of receiving the prescription.

I understand and agree to fully and timely participate in all treatment, continuing care, and non-DOT follow-up testing recommendations of EAP. I understand that if I fail to timely participate in EAP's recommendations, after receiving a written notification of non-compliance, my employment will be terminated.

I understand that after completing a rehabilitation program recommended by EAP, I will be required to undergo a Return to Duty drug and alcohol test. A verified positive result on a return to duty test will be considered a DOT drug testing violation. This will subject the employee to the First offender policy and will require further rehabilitation. If the employee tests positive on his/her subsequent return to duty test, the employee will be discharged. If I test negative on either my first or second self-identification Return To Duty test and test positive on a subsequent DOT test, I will be subject to the Company's First Time Offender Policy, unless I had a positive test in the 60 months prior to that test (in which case I will be subjected to discharge).

I understand that, upon return to duty, I am subject to EAP monitoring and up to six unannounced non-DOT follow-up tests during the subsequent 12 months. I certify that I have read and understand the conditions above and I agree that failure to comply with the terms of this agreement will subject me to termination of employment.

Employee – Print Name:

Employee – Signature

EAP Counselor – Print Name:

EAP Counselor – Signature:

Date:

Date:

¹³ Employee contacts Onsite counselor for appointment. (See “ DOT-Covered Employee Self-Identifies to EAP Onsite Counselor” procedural narrative)



Chapter 11: Return-to-Duty and Follow-up Testing

1 Guidelines for Return-to-Duty Testing

Return to Duty test(s) and the SAP's evaluation of an individual's return to duty status provides some degree of assurance to the Company that the individual is presently free of alcohol and/or any prohibited drugs and is able to return to duty.

Before any employee is allowed to return to duty to perform a safety-sensitive function following a verified positive drug test result, an alcohol result of 0.04 or greater, a refusal to submit to a test, or any other activity that violates the regulations, that employee must first be evaluated by a SAP, comply with the return to duty process and pass a return to duty test(s).

1. The SAP is the sole decision-maker of when an employee is released to return to duty.
2. Following successful compliance with the return to duty process, a negative drug and/or alcohol screen is required before an employee can return to performing safety sensitive duties.
3. Upon SAP formal notification that an employee is released to return to duty, the DER contacts the employee to coordinate scheduling the return to duty drug and/or alcohol screen. *The test(s) will be scheduled as soon as possible, and it will be observed .*

2 Guidelines for Follow-up Testing


Once allowed to return to duty, an employee shall be subject to unannounced directly observed follow-up testing for at least 12 but not more than 60 months. The frequency and duration of the follow-up testing will be recommended by the SAP. The SAP will assign a minimum of 6 tests during the first 12 months to be completed after the employee has returned to duty, but could assign testing for up to 60 months.

1. The DER/TPA schedules follow-up testing based on the SAP's recommendation and notifies the immediate supervisor of the appointment and location of collection.
2. The immediate exempt supervisor or a designated alternate notifies the employee of the testing information (reporting time and location). *In general, notification shall precede testing by no more than two hours.*
3. The exempt supervisor reports back to the DER/TPA to reschedule an appointment if the employee is unavailable for testing due to absence. Employee shall not be notified of the changes made to the scheduled test.
4. **If an employee does not arrive at the designated collection site at the appointed time, the collection site personnel notifies the DER, who investigates and, if necessary, takes appropriate action. The employee may be subjected to disciplinary action or termination of employment if the reason for failure to arrive at the designated time is not acceptable.**



3 Follow up and Return-to-Duty Agreement

The Agreement form is shown below:

	Pacific Gas and Electric Company®	<i>Department of Transportation & Regulatory Compliance Transportation Services</i>
RETURN TO DUTY AGREEMENT – FOLLOWING DOT VIOLATION		
I acknowledge that I was removed from performing my job duties, which are subject to the Company's federally mandated drug and alcohol testing program policies, on ____/____/____ as a result of the following violation(s):		
<input type="checkbox"/> Verified positive result on urine drug screen <input type="checkbox"/> Breath alcohol concentration of .04 or greater <input type="checkbox"/> Refusal to test		
I further acknowledge that I have received specific instructions from Pacific Gas & Electric Company's Medical Review Officer/Substance Abuse Professional (MRO/SAP) describing the treatment program(s), including follow-up monitoring and after-care if applicable, which has been determined necessary for my compliance with the requirements of Pacific Gas and Electric Company's drug testing program policies and the Department of Transportation's return to duty process.		
I agree to fully participate in, and complete, any and all treatment and after-care programs, including any abstinence agreement prescribed by the MRO/SAP and promptly and fully cooperate with all instructions.		
I further agree to fully comply with the terms and conditions of any prescribed treatment program(s) whether or not I have executed a written contract with the provider.		
I agree to provide the MRO/SAP, or designee, with documentation of my attendance at, and/or participation in, the treatment program(s) specified.		
I understand that failure to fully meet any of the terms set forth above will result in disciplinary action or the termination of my employment.		
I understand that pursuant to DOT regulations, for the next 60-month safety sensitive follow-up period ¹ , I am subject to unannounced follow-up drug and/or alcohol testing as defined by the MRO/SAP following my return to duty. I further understand that such follow-up drug and/or alcohol testing is in addition to my continued participation in the federally mandated random drug and/or alcohol testing program. I also remain subject to reasonable suspicion and post-accident drug and/or alcohol testing.		
I understand that if I test positive for any prohibited drugs or alcohol during the next 60-month safety sensitive follow-up period, including legal drugs for which I do not have a prescription, or test positive on a breath-alcohol test, I am subject to the immediate termination of my employment.		

Employee – Print Name		
_____		_____
Employee – Signature		Date

HR Labor Specialist – Print Name		
_____		_____
HR Labor Specialist – Signature		Date
¹ Time absent from safety sensitive position (LTD, Workers Comp, LOA, Transfers, Rotations, etc.) for more than 30 days will not be counted towards the 60-month safety sensitive follow-up period.		
<small>Original: Program Coordinator Copy: Employee Initial _____ A COPY OF THIS AGREEMENT WAS PROVIDED TO THE EMPLOYEE</small>		
<small>TRAN-FM-018 Rev. Date 08/09/2013</small>		



Chapter 12: Unusual Situations

1 Refusal to Test (Urine Specimen Collection)

There are number of behaviors defined in the regulation that constitute a test refusal. Anytime an employee exhibits any of these behaviors, the collector must immediately terminate the test, notify the DER directly, and note the test refusal on the form.

As an employee, you have refused to take a drug test if you¹⁴:

1. Fail to appear for any test (except a pre-employment test) within a reasonable time, as determined by the employer, consistent with applicable DOT agency regulations, after being directed to do so by the employer. This includes the failure of an employee (including an owner-operator) to appear for a test when called by a C/TPA (see Title 49 CFR Part §40.61(a));
2. Fail to remain at the testing site until the testing process is complete; Provided, That an employee who leaves the testing site before the testing process commences (see Title 49 CFR Part §40.63(c)) for a pre-employment test is not deemed to have refused to test;
3. Fail to provide a urine specimen for any drug test required by this part or DOT agency regulations; Provided, That an employee who does not provide a urine specimen because he/she has left the testing site before the testing process commences (see Title 49 CFR Part §40.63(c)) for a pre-employment test is not deemed to have refused to test;
4. In the case of a directly observed or monitored collection in a drug test, fail to permit the observation or monitoring of your provision of a specimen (see Title 49 CFR Part §40.67(l) and Title 49 CFR Part §40.69(g));
5. Fail to provide a sufficient amount of urine when directed, and it has been determined, through a required medical evaluation, that there was no adequate medical explanation for the failure (see Title 49 CFR Part §40.193(d)(2));
6. Fail or decline to take an additional drug test the employer or collector has directed you to take (see, for instance, Title 49 CFR Part §40.197(b));
7. Fail to undergo a medical examination or evaluation, as directed by the MRO as part of the verification process, or as directed by the DER under Title 49 CFR Part §40.193(d). In the case of a pre-employment drug test, the employee is deemed to have refused to test on this basis only if the pre-employment test is conducted following a contingent offer of employment. If there was no contingent offer of employment, the MRO will cancel the test; or
8. Fail to cooperate with any part of the testing process (e.g., refuse to empty pockets when directed by the collector, behave in a confrontational way that disrupts the collection process, fail to wash hands after being directed to do so by the collector).

¹⁴ Title 49 CFR Part §40.191, May 12, 2016



9. For an observed collection, fail to follow the observer's instructions to raise your clothing above the waist, lower clothing and underpants, and to turn around to permit the observer to determine if you have any type of prosthetic or other device that could be used to interfere with the collection process.
10. Possess or wear a prosthetic or other device that could be used to interfere with the collection process.
11. Admit to the collector or MRO that you adulterated or substituted the specimen.

As an employee, if the MRO reports that you have a verified adulterated or substituted test result, you have refused to take a drug test.

As an employee, if you refuse to take a drug test, you incur the consequences specified under DOT agency regulations for a violation of those DOT agency regulations.

2 Refusal to Take an Alcohol Test

As an employee, you are considered to have refused to take an alcohol test if you¹⁵:

1. Fail to appear for any test (except a pre-employment test) within a reasonable time, as determined by the employer, consistent with applicable DOT agency regulations, after being directed to do so by the employer. This includes the failure of an employee (including an owner-operator) to appear for a test when called by a C/TPA (see Title 49 CFR Part §40.241(a));
2. Fail to remain at the testing site until the testing process is complete; Provided, That an employee who leaves the testing site before the testing process commences (see Title 49 CFR Part §40.243(a)) for a pre-employment test is not deemed to have refused to test;
3. Fail to provide an adequate amount of saliva or breath for any alcohol test required by this part or DOT agency regulations; Provided, That an employee who does not provide an adequate amount of breath or saliva because he/she has left the testing site before the testing process commences (see Title 49 CFR Part §40.243(a)) for a pre-employment test is not deemed to have refused to test;
4. Fail to provide a sufficient breath specimen, and the physician has determined, through a required medical evaluation, that there was no adequate medical explanation for the failure (see Title 49 CFR Part §40.265(c));
5. Fail to undergo a medical examination or evaluation, as directed by the employer as part of the insufficient breath procedures outlined at Title 49 CFR Part §40.265(c);
6. Fail to sign the certification at Step 2 of the ATF (see Title 49 CFR Parts §40.241(g) and §40.251(d)); or
7. Fail to cooperate with any part of the testing process.

As an employee, if you refuse to take an alcohol test, you incur the same consequences specified under DOT agency regulations for a violation of those DOT agency regulations.

¹⁵ Title 49 CFR Part §40.261, updated June 1, 2016



3 Failure to Provide Urine Specimen

3.1 Shy Bladder

If an employee is unable to provide a sufficient amount of urine for a drug test, the employee will be encouraged to drink up to 40 ounces of fluid, distributed reasonably through a period of up to three hours, or until the individual has provided a sufficient urine specimen volume, whichever occurs first. It is not a refusal to test if the employee declines to drink fluid during the three hours.¹⁶

1. If the employee refuses to make the attempt to provide a new urine specimen or leaves the collection site before the collection process is complete (before the three-hour period); the collector will discontinue the collection and immediately notify the DER. This is a refusal to test.
2. The collector will inform the employee when the three-hour time limit begins. If the employee has not provided a sufficient specimen within three hours of the first unsuccessful attempt to provide the specimen, the employee will be removed from work with permission, without pay until the results of a medical evaluation are obtained. Within five business days, the employee must attend an evaluation with a licensed physician, that is acceptable to the MRO, who has expertise in the medical issues raised by the employee's failure to provide a sufficient specimen. (The MRO may perform this evaluation if the MRO has appropriate expertise.) The Company will inform the employee of the location and date/time of the appointment take inconsideration of work schedule and physician schedule.
3. Upon completion of the evaluation, the referring physician that performed the evaluation will provide the result of the exam to the MRO in a written statement.
4. The MRO will cancel the test if there is adequate basis for determining that a medical condition precluded the employee from providing a sufficient amount of urine. The employee will be reinstated with back pay.
5. The MRO will rule the test a Refusal to Test if there is not an adequate basis for determining that a medical condition has, or with a high degree of probability could have, precluded the employee from providing a sufficient amount of urine. The employee will be referred to a SAP for an evaluation and is subject to the Verified Positive Drug Test Procedures if applicable.

¹⁶ Title 49 CFR Part §40.193, updated May 12, 2016



4 Inability to Provide Adequate Breath for Testing

4.1 Shy Lung

If an employee attempts and fails to provide enough breath, the BAT must instruct the employee to make another attempt to provide a sufficient breath specimen. The BAT should provide additional instruction on the technique that should be followed and coach the employee through the process. If the second attempt is unsuccessful, the BAT may provide another opportunity to the employee to provide a breath sample if the BAT believes it is likely that the next attempt would be successful.

1. If the individual is still unable to provide a sufficient breath sample, the BAT may attempt to operate the EBT in manual mode, or they may use a saliva ASD, if available. If attempts are still unsuccessful, the BAT/STT will contact the DER and note the insufficient volume on the ATF. The employee will be removed from work with permission, without pay until the results of a medical evaluation are obtained. Within five business days, the employee must attend an evaluation with a licensed physician, that is acceptable to the MRO, who has expertise in the medical issues raised by the employee's failure to provide a sufficient breath sample. (The MRO may perform this evaluation if the MRO has appropriate expertise.) *The Company will inform the employee of the location and date/time of the appointment take inconsideration of work schedule and physician schedule.*
2. Upon completion of the evaluation, the referring physician that performed the evaluation will provide the result of the exam to the MRO in a written statement.
3. The MRO will cancel the test if there is adequate basis for determining that a medical condition precluded the employee from providing a sufficient amount of breath. *The employee will be reinstated with back pay.*
4. The MRO will rule the test a Refusal to Test if there is not an adequate basis for determining that a medical condition has, or with a high degree of probability could have, precluded the employee from providing a sufficient breath sample. The employee will be referred to a SAP for an evaluation and is subjected to the Confirmed Positive Alcohol Test Procedures if applicable.



Chapter 13: Medical Review Officer (MRO) and Substance Abuse Professionals

1 Laboratory Procedures

All drug testing under the DOT regulations must be completed in a laboratory certified by the HHS under the National Laboratory Certification Program (NLCP). These laboratories have been rigorously inspected and tested and meet the highest standards for analytical competence.

1. All laboratories that conduct drug tests under the DOT-covered program must comply with both the DOT requirements set forth in Title 49 CFR Part § 40 Subpart F and the HHS requirements.
2. The Company has a contracted HHS-certified primary laboratory and a contract with at least one additional laboratory for split sample analysis and to serve as a backup in case problems arise with the primary lab.
3. Specimen Inspection - the DOT regulation requires the lab to first inspect each specimen and the CCF for fatal and correctable flaws. If no fatal flaw exists, but correctable flaws are found, the lab must document the flaw and take corrective action as defined in Title 49 CFR Part §40.205.
4. Validity Testing - specimen validity testing is the evaluation of the specimen to determine if it is consistent with normal human urine or if certain adulterants or foreign substances were added to the urine, the urine was diluted, or the specimen was substituted.
5. Each primary specimen will be tested for creatinine, pH, and adulterants. If the creatinine level is less than 20 mg/mL, the specific gravity of the specimen will also be measured. If the creatinine concentration is less than 20 mg/mL and the specific gravity is less than 1.003, the specimen is considered dilute. If the specimen is super dilute with a creatinine concentration of less than or equal to 5 mg/mL and the specific gravity is less than or equal to 1.001 or greater than or equal to 1.020, the specimen is considered substituted, as the human body is incapable of providing a specimen with those quantifications.
6. A specimen is considered to be adulterated when the specimen's physical characteristics are outside the normal expected range for human urine, a substance is present that is not expected in human urine, or a substance is present at concentrations so high that it is not consistent with human urine.
7. Drug and Drug Metabolite Testing: The laboratory must test for the following five drugs or their metabolites using the testing protocols and minimum cutoff thresholds defined in the DOT regulations: marijuana, cocaine, ecstasy (MDMA), opiates (e.g., heroin, morphine, and codeine), phencyclidine (PCP), and amphetamines (e.g., racemic amphetamine, dextroamphetamine, and methamphetamine). The initial test is an immunoassay test. If any prohibited drug or its metabolite registers above the cutoff level on the immunoassay screen, an aliquot of the same urine specimen must be confirmed by using a technique called gas chromatography/mass spectrometry (GC/MS).



8. The initial test result is based on the ability of antibodies to recognize drugs in biological fluids. Immunoassay tests, called screens, are simple to run and are often automated, and are relatively inexpensive. The confirmatory tests are more accurate, more time consuming, require sophisticated laboratory equipment, and thus are more expensive than immunoassay screens. The confirmatory test permitted by Title 49 CFR Part §40 is GC/MS.
9. Test Results: The laboratory may only report the test results to the designated Medical Review Officer (MRO). The test results will be reported to the MRO as negative, negative-dilute, positive, positive-dilute, adulterated, substituted, invalid, or rejected for testing. An invalid test is one where the urine specimen contains an unidentified adulterant or an unidentified interfering substance, has abnormal physical characteristics, or has an endogenous substance at an abnormal concentration that prevents the laboratory from completing or obtaining a valid drug test result.
10. The laboratory must confidentially transmit the test results to the MRO in a timely manner (i.e., the same day that the test result is reviewed by the lab's certifying scientist). Except for opiate positives with morphine or codeine levels at 15,000 ng/mL or above, test results will not be provided with quantitative values unless a specific request is made by an MRO.
11. Opiate levels above 15,000 ng/mL will be automatically reported because the responsibilities of the MRO and employee change with opiate levels this high. In this case the burden of proof shifts to the employee to provide a verifiable medical explanation for such high levels.
12. Split Specimen Testing – The primary laboratory must provide secure storage for the split sample for one year if the primary specimen is positive, adulterated, or substituted. If directed by the MRO, the primary laboratory shall forward the split specimen bottle, with seal intact, a copy of the MRO request, and a copy of the custody and control form to a different HHS-approved laboratory. If the split specimen is unavailable for testing, the lab must provide as much information as possible to the MRO regarding the cause of the unavailability.
13. In the case of a positive test result, the second lab must test the specimen for the presence of the drug(s) or drug metabolite independent of the cutoff levels. If the presence of the substance(s) is found, the primary test will be confirmed positive. If the test fails to reconfirm the presence of the drug/metabolites that were reported positive by the primary lab, the second lab must conduct validity testing on the split to determine if the specimen was adulterated or substituted. If the split does not reconfirm the presence of the drug/metabolite and there is no evidence of adulteration or substitution, the result will be reported to the MRO, the tests will be cancelled, and the failure to reconfirm will be reported to the DOT Office of Drug and Alcohol Policy and Compliance (ODAPC). In some cases, an immediate observed collection may be required.¹⁷

¹⁷ Title 49 CFR Part §40.187(b)(2)



14. Where a primary test result shows the specimen was adulterated or substituted, the second lab must test the split specimen in the same manner as the primary to determine if the specimen was adulterated or substituted. If the adulteration or substitution is found, the primary test result will be confirmed. If not, the MRO will notify the DER and employee that both tests must be cancelled and the reason for cancellation. Then the MRO will direct the DER to ensure the immediate collection of another specimen from the employee under direct observation, with no notice given to the employee of this collection requirement until immediately before the collection. The failure to reconfirm will also be reported to the ODAPC.
15. If the split is unavailable for testing and, therefore, cannot be used to reconfirm the primary test result, both tests will be cancelled and the MRO will direct the employer to have the employee retested under direct observation. Split specimen test results can only be reported to the MRO.
16. Specimen Storage and Record Keeping: All confirmed non-negative specimens must be retained by the laboratory in long-term frozen storage for a minimum of one year. The laboratory must provide semi-annual summation reports consistent with Title 49 CFR Part §40, Appendix B reporting requirements to each covered employer for whom they conduct testing.

2 MRO Procedures

The DOT regulation requires that all drug testing laboratory results must be reviewed by a qualified Medical Review Officer (MRO). The purpose of this review is to verify and validate test results.

An MRO is defined in the regulation as a licensed physician responsible for receiving and reviewing laboratory results generated by an employer's drug testing program and evaluating medical explanations for certain drug test results. The MRO must be knowledgeable about and have clinical experience in controlled substance abuse disorders. The MRO must have the appropriate medical training to interpret and evaluate laboratory confirmed positive test results and be knowledgeable about alternative medical explanations for laboratory confirmed test results. The MRO must be aware of issues relating to adulterated and substituted specimens and possible medical causes for invalid test results.

MRO must know the DOT MRO Guidelines, Title 49 CFR Part §40 and applicable DOT agency rules. MRO's must receive qualification training and complete at least 12 hours of professional development hours of continuing education that is relevant to MRO functions during each subsequent three-period.

The MRO is to serve as an independent, impartial gatekeeper responsible for the accuracy and integrity of the drug testing process. As such, the MRO is required to perform the following functions:

1. Receive the results of drug tests from the laboratory.
2. Conduct administrative review of the CCF to ensure it is legible, accurate, and signed by the laboratory's certifying scientist. Check for fatal and correctable flaws. Take action to immediately correct correctable flaws. If appropriate, the MRO may request the laboratory to analyze the original specimen again to verify the accuracy of the reported test result.



3. Provide feedback as appropriate to the DER and service agents regarding performance issues.
4. The MRO or his/her staff must make at least three attempts to contact the employee spaced reasonably over a 24-hour period, including the day and evening telephone numbers listed on the CCF. All attempts to contact the employee must be documented.
5. If, after making a reasonable effort, the MRO is unable to reach the employee directly, the MRO shall contact the DER/DAPM. The DER should make at least three attempts to contact the employee within a 24-hour period. If contact is made, the DER must instruct the employee to contact the MRO immediately (no longer than 72 hours) and explain the consequences of failing to do so (The DER must document the date and time of all attempts to contact the employee inform the MRO the date and time the employee was contacted). If the employee fails to contact the MRO within 72 hours, the test will be verified as a no-contact positive. If, after making reasonable efforts (at least 3 attempts) over a 24-hour period, the DER is unable to contact the employee, the employer may leave a message for the employee instructing him/her to contact the MRO and place the employee on temporary unqualified status or medical leave. If 10 days pass with no employee contact, the MRO will verify the test result as a no-contact positive. All attempts to contact the employee must be documented.
6. If contact is made, the MRO must provide the employee with the opportunity to discuss the test result on a confidential basis. If the employee declines to discuss the test result with the MRO, the test will be verified as a confirmed (Title 49 CFR Part §40.133) positive test result. If the employee wishes to talk to the MRO, the MRO staff may schedule the interview, but must not gather any medical information or information concerning possible explanations for the test result. The staff may advise an employee to have medical information ready to present to the MRO.
7. The MRO verification interview with the employee must be made by telephone or in person. The MRO must tell the employee that the test result was positive, adulterated, substituted, or invalid and the basis for the test result (i.e., presence of drug or adulterant, or validity test results). The MRO must explain the verification process and the potential need for further medical evaluation. The MRO must warn the employee before any medical information is discussed that the MRO must disclose to third parties (i.e., employer, SAP, DOT), without the employee's consent, drug test result information and medical information affecting the performance of safety -sensitive duties that the employee provides.
8. The MRO will review and interpret an individual's confirmed non-negative (i.e., positive, adulterated, substituted, invalid) test by (1) reviewing the individual's medical history, including any medical records and biomedical information provided; (2) affording the individual an opportunity to discuss the test result; and (3) verifying the authenticity of all medical records (i.e., prescriptions, medical procedures) the employee provides. The MRO may contact the employee's physician or other relevant medical personnel for further information. Based on the information that was provided and verified, the MRO must decide whether there is a legitimate medical explanation for the result, including legally prescribed medication.



3 SAP Procedures

An employee who tests positive for drugs or alcohol or refuses a test, will be removed immediately from his/her safety-sensitive functions and evaluated by a Company Designated Substance Abuse Professional (SAP)¹⁸.

1. The SAP will evaluate each employee to determine what assistance the employee needs in resolving problems associated with substance abuse.
2. The evaluation will consist of a clinical assessment, treatment recommendations, and referrals, as appropriate.
3. The SAP will inform the Company, in writing, of the clinical assessment based treatment recommendations, which the employee must comply with. In addition, the SAP will specify the duration and frequency of follow-up drug and/or alcohol tests.
4. The SAP's evaluations, assessment, treatment recommendations, referrals and follow-up testing recommendations will be in accordance with Title 49 CFR Part §40 Subpart O.

¹⁸ SAP Guidelines Publications:

<https://www.transportation.gov/sites/dot.gov/files/docs/ODAPC%20SAP%20Guide%20Aug09.pdf>



Chapter 14: Disciplinary Actions

1 Actions Based on Verified Positive Urinalysis or a Confirmed Alcohol Concentration of 0.04 or Greater, or Abstinence Period Failures

1.1 First Determination of a Verified Positive Urinalysis

1. The Medical Review Officer (MRO) shall notify the DER of all verified positive drug tests.
2. The DER shall promptly notify the responsible Supervisor.
3. Upon notification from the DER, the supervisor to promptly remove the tested individual from his/her job duties. If the employee qualifies for the First Time Violator's Program, the employee will be sent home pending the start of the return to duty process. If already off duty, the individual will remain off duty until successful completion of the return to duty process.
4. An employee who is unable to perform normal job duties because of removal from work due to a verified positive test will be placed on paid sick leave, vacation if available, or unpaid leave (per employee's decision).
5. The employee will be reinstated to full job duties upon approval of the Substance Abuse Professional and successful completion of the return to duty test.
6. If an employee does not agree with the MRO's decision of a verified positive controlled substance test, he/she can request that the MRO authorize the lab to conduct an analysis of the second part of the "split sample" being held by the laboratory. This analysis will be performed by another PG&E contracted laboratory. The specimen is tested for the presence of the drug(s) for which a positive result was obtained in the first test. The results of this test are transmitted to the MRO and will be the test of record. The MRO shall honor such request if it is made within 72 hours of the employee's having actual notice that he/she tested positive.
7. If the results of the test on the second part of the "split sample" are positive, the "verified positive" test result is validated and the employee will be required to follow the SAP's instructions.
8. If the results of the test on the second part of the "split sample" are negative, both tests will be cancelled and reported to the DER. In certain circumstances, an immediate observed collection may be required by the MRO. See Title 49 CFR Part §40.187(b)(2).
9. Testing of an additional urine specimen is not authorized by the DOT regulations and, therefore, will not be recognized by the Company and the Union.



1.2 Confirmed Alcohol Concentration of 0.04 or Greater

1. The Breath Alcohol Tech (BAT) will notify the DER of all confirmed positive alcohol tests.
2. The DER shall promptly notify the responsible Supervisor .
3. Upon notification from the DER, the supervisor will promptly remove the tested individual from his/her job duties. If the employee qualifies for the First Time Violator's Program, the employee will be sent home pending the start of the return to duty process. If already off duty, the individual will remain off duty until successful completion of the return to duty process.
4. Following the administration of a breath alcohol test: After returning from the collection site, the employee should not be allowed to perform any covered functions if the employee's alcohol test result is positive. In this event, the exempt supervisor will make arrangements for the employee to be transported home. The employee should be instructed not to drive any motor vehicle because he/she is under the influence of alcohol. If the employee insists on driving, the proper local law enforcement authority may be notified that an employee under the influence of alcohol is leaving the Company premises driving a motor vehicle. The employee will be subjected to disciplinary action or discharge.
5. An employee who is unable to perform normal job duties because of removal from work due to a verified positive test will be placed, at the employee's option, on paid sick leave, vacation if available, or unpaid leave (per employee's decision).
6. The employee will be reinstated to full job duties upon approval of the Substance Abuse Professional and Successful completion of the return to duty test.
7. Alcohol testing will be conducted by a certified Breath Alcohol Technician utilizing EBT's and ASD's on the NHTSA conforming products lists (CPL).

Definitions Used by DOT Agencies

Title 49 CFR Part §40 Definitions (chapters 4, 5, 6, 7, 8, 11, 12, 13, and 14 of this document)

Adulterated specimen: A specimen that has been altered, as evidenced by test results showing either a substance that is not a normal constituent for that type of specimen or showing an abnormal concentration of an endogenous substance.

Affiliate: Persons are affiliates of one another if, directly or indirectly, one controls or has the power to control the other, or a third party controls or has the power to control both. Indicators of control include, but are not limited to: interlocking management or ownership; shared interest among family members; shared facilities or equipment; or common use of employees. Following the issuance of a public interest exclusion, an organization having the same or similar management, ownership, or principal employees as the service agent concerning whom a public interest exclusion is in effect is regarded as an affiliate. This definition is used in connection with the public interest exclusion procedures of Subpart R of Title 49 CFR Part §40.

Air blank: In evidential breath testing devices (EBTs) using gas chromatography technology, a reading of the device's internal standard. In all other EBTs, a reading of ambient air containing no alcohol.

Alcohol: The intoxicating agent in beverage alcohol, ethyl alcohol or other low molecular weight alcohols, including methyl or isopropyl alcohol.

Alcohol concentration: The alcohol in a volume of breath expressed in terms of grams of alcohol per 210 liters of breath as indicated by a breath test under this part.

Alcohol confirmation test: A subsequent test using an EBT, following a screening test with a result of 0.02 or greater, that provides quantitative data about the alcohol concentration.

Alcohol screening device (ASD): A breath or saliva device, other than an EBT, that is approved by the National Highway Traffic Safety Administration (NHTSA) and placed on a conforming products list (CPL) for such devices.

Alcohol screening test: An analytic procedure to determine whether an employee may have a prohibited concentration of alcohol in a breath or saliva specimen.

Alcohol testing site: A place selected by the employer where employees present themselves for the purpose of providing breath or saliva for an alcohol test.

Alcohol use: The drinking or swallowing of any beverage, liquid mixture or preparation (including any medication), containing alcohol.

Aliquot: A fractional part of a specimen used for testing. It is taken as a sample representing the whole specimen.



Blind specimen or blind performance test specimen: A specimen submitted to a laboratory for quality control testing purposes, with a fictitious identifier, so that the laboratory cannot distinguish it from an employee specimen.

Breath Alcohol Technician (BAT): A person who instructs and assists employees in the alcohol testing process and operates an evidential breath testing device.

Cancelled test: A drug or alcohol test that has a problem identified that cannot be or has not been corrected, or which this part otherwise requires to be cancelled. A cancelled test is neither a positive nor a negative test.

Chain of custody: The procedure used to document the handling of the urine specimen from the time the employee gives the specimen to the collector until the specimen is destroyed. This procedure uses the Federal Drug Testing Custody and Control Form (CCF) as approved by the Office of Management and Budget.

Collection container: A container into which the employee urinates to provide the specimen for a drug test.

Collection site: A place selected by the employer where employees present themselves for the purpose of providing a urine specimen for a drug test.

Collector: A person who instructs and assists employees at a collection site, who receives and makes an initial inspection of the specimen provided by those employees, and who initiates and completes the CCF.

Confirmatory drug test: A second analytical procedure performed on a different aliquot of the original specimen to identify and quantify the presence of a specific drug or drug metabolite.

Confirmatory validity test: A second test performed on a different aliquot of the original urine specimen to further support a validity test result.

Confirmed drug test: A confirmation test result received by an MRO from a laboratory.

Consortium/Third-party administrator (C/TPA): A service agent that provides or coordinates the provision of a variety of drug and alcohol testing services to employers: C/TPAs typically perform administrative tasks concerning the operation of the employers' drug and alcohol testing programs. This term includes, but is not limited to, groups of employers who join together to administer, as a single entity, the DOT drug and alcohol testing programs of its members. C/TPAs are not "employers" for purposes of this part.

Continuing education: Training for substance abuse professionals (SAPs) who have completed qualification training and are performing SAP functions, designed to keep SAPs current on changes and developments in the DOT drug and alcohol testing program.



Designated Employer Representative (DER): An employee authorized by the employer to take immediate action(s) to remove employees from safety-sensitive duties, or cause employees to be removed from these covered duties, and to make required decisions in the testing and evaluation processes. The DER also receives test results and other communications for the employer, consistent with the requirements of this part. Service Agents cannot act as DERs.

Dilute specimen: A urine specimen with creatinine and specific gravity values that are lower than expected for human urine.

DOT, The Department, DOT agency: These terms encompass all DOT agencies, including, but not limited to, the United States Coast Guard (USCG), the Federal Aviation Administration (FAA), the Federal Railroad Administration (FRA), the Federal Motor Carrier Safety Administration (FMCSA), the Federal Transit Administration (FTA), the National Highway Traffic Safety Administration (NHTSA), the Pipeline and Hazardous Materials Safety Administration (PHMSA), and the Office of the Secretary (OST). These terms include any designee of a DOT agency.

Drugs: The drugs for which tests are required under this part and DOT agency regulations are marijuana, cocaine, amphetamines, phencyclidine (PCP), and opiates.

Employee: Any person who is designated in a DOT agency regulation as subject to drug testing and/or alcohol testing. The term includes individuals currently performing safety-sensitive functions designated in DOT agency regulations and applicants for employment subject to pre-employment testing. For purposes of drug testing under this part, the term employee has the same meaning as the term “donor” as found on CCF and related guidance materials produced by the Department of Health and Human Services.

Employer: A person or entity employing one or more employees (including an individual who is self-employed) subject to DOT agency regulations requiring compliance with this part. The term includes an employer's officers, representatives, and management personnel. Service agents are not employers for the purposes of this part.

Error Correction Training: Training provided to BATs, collectors, and screening test technicians (STTs) following an error that resulted in the cancellation of a drug or alcohol test. Error correction training must be provided in person or by a means that provides real-time observation and interaction between the instructor and trainee.

Evidential Breath Testing Device (EBT): A device approved by NHTSA for the evidential testing of breath at the .02 and .04 alcohol concentrations, placed on NHTSA's Conforming Products List (CPL) for “Evidential Breath Measurement Devices” and identified on the CPL as conforming with the model specifications available from NHTSA's Traffic Safety Program.

HHS: The Department of Health and Human Services or any designee of the Secretary, Department of Health and Human Services.

Initial drug test (also known as a Screening drug test): The test used to differentiate a negative specimen from one that requires further testing for drugs or drug metabolites.



Initial specimen validity test: The first test used to determine if a urine specimen is adulterated, diluted, substituted, or invalid.

Invalid drug test: The result reported by an HHS-certified laboratory in accordance with the criteria established by HHS Mandatory Guidelines when a positive, negative, adulterated, or substituted result cannot be established for a specific drug or specimen validity test.

Laboratory: Any U.S. laboratory certified by HHS under the National Laboratory Certification Program as meeting the minimum standards of Subpart C of the HHS Mandatory Guidelines for Federal Workplace Drug Testing Programs; or, in the case of foreign laboratories, a laboratory approved for participation by DOT under this part.

Limit of Detection (LOD): The lowest concentration at which a measurand can be identified, but (for quantitative assays) the concentration cannot be accurately calculated.

Limit of Quantitation: For quantitative assays, the lowest concentration at which the identity and concentration of the measurand and can be accurately established.

Medical Review Officer (MRO): A person who is a licensed physician and who is responsible for receiving and reviewing laboratory results generated by an employer's drug testing program and evaluating medical explanations for certain drug test results.

Negative result: The result reported by an HHS-certified laboratory to an MRO when a specimen contains no drug or the concentration of the drug is less than the cutoff concentration for the drug or drug class and the specimen is a valid specimen.

Non-negative specimen: A urine specimen that is reported as adulterated, substituted, positive (for drug(s) or drug metabolite(s)), and/or invalid.

Office of Drug and Alcohol Policy and Compliance (ODAPC): The office in the Office of the Secretary, DOT, that is responsible for coordinating drug and alcohol testing program matters within the Department and providing information concerning the implementation of this part.

Oxidizing adulterant: A substance that acts alone or in combination with other substances to oxidize drugs or drug metabolites to prevent the detection of the drug or drug metabolites, or affects the reagents in either the initial or confirmatory drug test.

Positive result: The result reported by an HHS-certified laboratory when a specimen contains a drug or drug metabolite equal to or greater than the cutoff concentrations.

Primary specimen: In drug testing, the urine specimen bottle that is opened and tested by a first laboratory to determine whether the employee has a drug or drug metabolite in his/her system; and for the purpose of validity testing. The primary specimen is distinguished from the split specimen, defined in this section.



Qualification Training: The training required in order for a collector, BAT, MRO, SAP, or STT to be qualified to perform their functions in the DOT drug and alcohol testing program. Qualification training may be provided by any appropriate means (e.g., classroom instruction, internet application, CD-ROM, video).

Reconfirmed: The result reported for a split specimen when the second laboratory is able to corroborate the original result reported for the primary specimen.

Refresher Training: The training required periodically for qualified collectors, BATs, and STTs to review basic requirements and provide instruction concerning changes in technology (e.g., new testing methods that may be authorized) and amendments, interpretations, guidance, and issues concerning this part and DOT agency drug and alcohol testing regulations. Refresher training can be provided by any appropriate means (e.g., classroom instruction, internet application, CD-ROM, video).

Rejected for testing: The result reported by an HHS-certified laboratory when no tests are performed for a specimen because of a fatal flaw or a correctable flaw that is not corrected.

Screening Drug Test: See Initial drug test definition above.

Screening Test Technician (STT): A person who instructs and assists employees in the alcohol testing process and operates an ASD.

Secretary: The Secretary of Transportation or the Secretary's designee.

Service agent: Any person or entity, other than an employee of the employer, who provides services to employers and/or employees in connection with DOT drug and alcohol testing requirements. This includes, but is not limited to, collectors, BATs and STTs, laboratories, MROs, substance abuse professionals, and C/TPAs. To act as service agents, persons and organizations must meet DOT qualifications, if applicable. Service agents are not employers for purposes of this part.

Shipping container: A container that is used for transporting and protecting urine specimen bottles and associated documents from the collection site to the laboratory.

Specimen bottle: The bottle that, after being sealed and labeled according to the procedures in this part, is used to hold the urine specimen during transportation to the laboratory.

Split specimen: In drug testing, a part of the urine specimen that is sent to a first laboratory and retained unopened, and which is transported to a second laboratory in the event that the employee requests that it be tested following a verified positive test of the primary specimen or a verified adulterated or substituted test result.

Split specimen collection: A collection in which the urine collected is divided into two separate specimen bottles, the primary specimen (Bottle A) and the split specimen (Bottle B).



Stand-down: The practice of temporarily removing an employee from the performance of safety-sensitive functions based only on a report from a laboratory to the MRO of a confirmed positive test for a drug or drug metabolite, an adulterated test, or a substituted test, before the MRO has completed verification of the test result.

Substance Abuse Professional (SAP): A person who evaluates employees who have violated a DOT drug and alcohol regulation and makes recommendations concerning education, treatment, follow-up testing, and aftercare.

Substituted specimen: A urine specimen with creatinine and specific gravity values that are so diminished or so divergent that they are not consistent with normal human urine.

Verified test: A drug test result or validity testing result from an HHS-certified laboratory that has undergone review and final determination by the MRO.



Title 49 CFR Part §199.3 Definitions (PHMSA)

Accident: means an incident reportable under Title 49 CFR Part §191 of this chapter involving gas pipeline facilities or LNG facilities, or an accident reportable under Title 49 CFR Part §195 of this chapter involving hazardous liquid pipeline facilities.

Administrator: means the Administrator, Pipeline and Hazardous Materials Safety Administration or his/her delegate.

Covered employee: employee, or individual to be tested means a person who performs a covered function, including persons employed by operators, contractors engaged by operators, and persons employed by such contractors.

Covered function: means an operations, maintenance, or emergency-response function regulated by part 192, 193, or 195 of this chapter that is performed on a pipeline or on an LNG facility.

DOT Procedures: means the Procedures for Transportation Workplace Drug and Alcohol Testing Programs published by the Office of the Secretary of Transportation in Title 49 CFR Part §40.

Fail a drug test: means that the confirmation test result shows positive evidence of the presence under DOT Procedures of a prohibited drug in an employee's system.

Operator: means a person who owns or operates pipeline facilities subject to Title 49 CFR Part §192, §193, or §195 of this chapter.

Pass a drug test: means that initial testing or confirmation testing under DOT Procedures does not show evidence of the presence of a prohibited drug in a person's system.

Performs a covered function: includes actually performing, ready to perform, or immediately available to perform a covered function.

PHMSA: Pipeline and Hazardous Materials Safety Administration

Positive rate: for random drug testing means the number of verified positive results for random drug tests conducted under this part plus the number of refusals of random drug tests required by this part, divided by the total number of random drug tests results (i.e., positives, negatives, and refusals) under this part.

Prohibited drug: means any of the following substances specified in Schedule I or Schedule II of the Controlled Substances Act (21 U.S.C. 812): marijuana, cocaine, opiates, amphetamines, and phencyclidine (PCP).

Refuse to submit: refuse or refuse to take means behavior consistent with DOT Procedures concerning refusal to take a drug test or refusal to take an alcohol test.



Title 49 CFR Part §382.107: Definitions (FMCSA)

Words or phrases used in this part are defined in Title 49 CFR Part §386.2 and §390.5 of this subchapter, and Title 49 CFR Part §40.3, except as provided in this section:

Actual knowledge: for the purpose of subpart B of this Title 49 CFR Part §382.107, means actual knowledge by an employer that a driver has used alcohol or controlled substances based on the employer's direct observation of the employee, information provided by the driver's previous employer(s), a traffic citation for driving a CMV while under the influence of alcohol or controlled substances or an employee's admission of alcohol or controlled substance use, except as provided in Title 49 CFR Part §382.121. Direct observation as used in this definition means observation of alcohol or controlled substances use and does not include observation of employee behavior or physical characteristics sufficient to warrant reasonable suspicion testing under Title 49 CFR Part §382.307.

Alcohol: means the intoxicating agent in beverage alcohol, ethyl alcohol, or other low molecular weight alcohols including methyl and isopropyl alcohol.

Alcohol concentration: (or content) means the alcohol in a volume of breath expressed in terms of grams of alcohol per 210 liters of breath as indicated by an evidential breath test under this part.

Alcohol use: means the drinking or swallowing of any beverage, liquid mixture or preparation (including any medication), containing alcohol.

Commerce means:

(1) Any trade, traffic or transportation within the jurisdiction of the United States between a place in a State and a place outside of such State, including a place outside of the United States; and

(2) Trade, traffic, and transportation in the United States which affects any trade, traffic, and transportation described in paragraph (1) of this definition.

Commercial motor vehicle: means a motor vehicle or combination of motor vehicles used in commerce to transport passengers or property if the vehicle

(1) Has a gross combination weight rating or gross combination weight of 11,794 kilograms or more (26,001 pounds or more), whichever is greater, inclusive of a towed unit(s) with a gross vehicle weight rating or gross vehicle weight of more than 4,536 kilograms (10,000 pounds), whichever is greater; or

(2) Has a gross vehicle weight rating or gross vehicle weight of 11,794 or more kilograms (26,001 or more pounds), whichever is greater; or

(3) Is designed to transport 16 or more passengers, including the driver; or

(4) Is of any size and is used in the transportation of materials found to be hazardous for the purposes of the Hazardous Materials Transportation Act (49 U.S.C. 5103(b)) and which require



the motor vehicle to be placarded under the Hazardous Materials Regulations (Title 49 CFR Part §172, subpart F).

Confirmation (or confirmatory) drug test: means a second analytical procedure performed on a urine specimen to identify and quantify the presence of a specific drug or drug metabolite.

Confirmation (or confirmatory) validity test: means a second test performed on a urine specimen to further support a validity test result.

Confirmed drug test: means a confirmation test result received by an MRO from a laboratory.

Consortium/Third party administrator (C/TPA): means a service agent that provides or coordinates one or more drug and/or alcohol testing services to DOT-regulated employers. C/TPAs typically provide or coordinate the provision of a number of such services and perform administrative tasks concerning the operation of the employers' drug and alcohol testing programs. This term includes, but is not limited to, groups of employers who join together to administer, as a single entity, the DOT drug and alcohol testing programs of its members (e.g., having a combined random testing pool). C/TPAs are not "employers" for purposes of this part.

Controlled substances: mean those substances identified in Title 49 CFR Part §40.85.

Designated employer representative (DER): is an individual identified by the employer as able to receive communications and test results from service agents and who is authorized to take immediate actions to remove employees from safety-sensitive duties and to make required decisions in the testing and evaluation processes. The individual must be an employee of the company. Service agents cannot serve as DERs.

Disabling damage: means damage which precludes departure of a motor vehicle from the scene of the accident in its usual manner in daylight after simple repairs.

(1) Inclusions. Damage to motor vehicles that could have been driven, but would have been further damaged if so driven.

(2) Exclusions. (i) Damage which can be remedied temporarily at the scene of the accident without special tools or parts.

(ii) Tire disablement without other damage even if no spare tire is available.

(iii) Headlight or taillight damage.

(iv) Damage to turn signals, horn, or windshield wipers which make them inoperative.

DOT Agency: means an agency (or "operating administration") of the United States Department of Transportation administering regulations requiring alcohol and/or drug testing (Title 14 CFR Parts §61, §63, §65, §121, and §135; Title 49 CFR Parts §199, §219, §382, and §655), in accordance with Title 49 CFR Part §40.



Driver: means any person who operates a commercial motor vehicle. This includes, but is not limited to: Full time, regularly employed drivers; casual, intermittent or occasional drivers; leased drivers and independent owner-operator contractors.

Employer: means a person or entity employing one or more employees (including an individual who is self-employed) that is subject to DOT agency regulations requiring compliance with this part. The term, as used in this part, means the entity responsible for overall implementation of DOT drug and alcohol program requirements, including individuals employed by the entity who take personnel actions resulting from violations of this part and any applicable DOT agency regulations. Service agents are not employers for the purposes of this part.

FMCSA: Federal Motor Carrier Safety Administration

Licensed medical practitioner: means a person who is licensed, certified, and/or registered, in accordance with applicable Federal, State, local, or foreign laws and regulations, to prescribe controlled substances and other drugs.

Performing (a safety-sensitive function): means a driver is considered to be performing a safety-sensitive function during any period in which he/she is actually performing, ready to perform, or immediately available to perform any safety-sensitive functions.

Positive rate for random drug testing: means the number of verified positive results for random drug tests conducted under this part plus the number of refusals of random drug tests required by this part, divided by the total number of random drug tests results (i.e., positives, negatives, and refusals) under this part.

Refuse to submit (to an alcohol or controlled substances test): means that a driver:

- (1) Fail to appear for any test (except a pre-employment test) within a reasonable time, as determined by the employer, consistent with applicable DOT agency regulations, after being directed to do so by the employer. This includes the failure of an employee (including an owner-operator) to appear for a test when called by a C/TPA (see Title 49 CFR Part §40.61(a));
- (2) Fail to remain at the testing site until the testing process is complete. Provided, that an employee who leaves the testing site before the testing process commences (see Title 49 CFR Part §40.63(c)) a pre-employment test is not deemed to have refused to test;
- (3) Fail to provide a urine specimen for any drug test required by this part or DOT agency regulations. Provided, that an employee who does not provide a urine specimen because he/she has left the testing site before the testing process commences (see Title 49 CFR Part §40.63(c)) for a pre-employment test is not deemed to have refused to test;
- (4) In the case of a directly observed or monitored collection in a drug test, fails to permit the observation or monitoring of the driver's provision of a specimen (see Title 49 CFR Parts § 40.67(l) and §40.69(g));



- (5) Fail to provide a sufficient amount of urine when directed, and it has been determined, through a required medical evaluation, that there was no adequate medical explanation for the failure (see Title 49 CFR Part § 40.193(d)(2));
- (6) Fail or declines to take a second test the employer or collector has directed the driver to take;
- (7) Fail to undergo a medical examination or evaluation, as directed by the MRO as part of the verification process, or as directed by the DER under Title 49 CFR Part § 40.193(d). In the case of a pre-employment drug test, the employee is deemed to have refused to test on this basis only if the pre-employment test is conducted following a contingent offer of employment;
- (8) Fail to cooperate with any part of the testing process (e.g., refuse to empty pockets when so directed by the collector, behave in a confrontational way that disrupts the collection process);
or
- (9) Is reported by the MRO as having a verified adulterated or substituted test result.

Safety-sensitive function means: all time from the time a driver begins to work or is required to be in readiness to work until the time he/she is relieved from work and all responsibility for performing work. Safety-sensitive functions shall include:

- (1) All time at an employer or shipper plant, terminal, facility, or other property, or on any public property, waiting to be dispatched, unless the driver has been relieved from duty by the employer;
- (2) All time inspecting equipment as required by Title 49 CFR Parts §392.7 and §392.8 of this subchapter or otherwise inspecting, servicing, or conditioning any commercial motor vehicle at any time;
- (3) All time spent at the driving controls of a commercial motor vehicle in operation;
- (4) All time, other than driving time, in or upon any commercial motor vehicle except time spent resting in a sleeper berth (a berth conforming to the requirements of Title 49 CFR Part §393.76 of this subchapter);
- (5) All time loading or unloading a vehicle, supervising, or assisting in the loading or unloading, attending a vehicle being loaded or unloaded, remaining in readiness to operate the vehicle, or in giving or receiving receipts for shipments loaded or unloaded; and
- (6) All time repairing, obtaining assistance, or remaining in attendance upon a disabled vehicle.



Screening test (or initial test) means:

- (1) In drug testing, a test to eliminate “negative” urine specimens from further analysis or to identify a specimen that requires additional testing for the presence of drugs.
- (2) In alcohol testing, an analytical procedure to determine whether an employee may have a prohibited concentration of alcohol in a breath or saliva specimen.

Stand-down: means the practice of temporarily removing an employee from the performance of safety-sensitive functions based only on a report from a laboratory to the MRO of a confirmed positive test for a drug or drug metabolite, an adulterated test, or a substituted test, before the MRO has completed verification of the test results.

Violation rate for random alcohol testing: means the number of 0.04 and above random alcohol confirmation test results conducted under this part plus the number of refusals of random alcohol tests required by this part, divided by the total number of random alcohol screening tests (including refusals) conducted under this part.



Appendices

1 Appendix A, Measuring “Randomness” of eScreen’s Random Drug Testing

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Measuring “Randomness” of eScreen’s Random Drug Testing

A Study by Dennis Bretz

Purpose

This is a study of the “randomness” of the numbers selected by eScreen when selecting donors for random drug testing. It is possible to statistically measure how random a sample is. Using methods identical to code used by John Ouverson’s group, this study sampled a large number of random numbers – to see if they qualify as statistically random.

Methods

I talked with John Ouverson, and he sent me the code used to select random donors from a pool of employees. I have looked at the code, and used it to mimic eScreen’s actions in selecting large samples of random numbers.

The heart of eScreen’s random number generation is the `newid()` function of Microsoft SQL Server. The `newid()` function returns a random GUID. A GUID is a Globally Unique IDentifier. We need a unique identifier, because a particular person is not selected twice for the same pull of employees for drug testing. [note: the same person may be selected multiple times for *different* tests, but not for the same test. i.e., John Doe wouldn’t be asked to take two drugs tests on April 25th, but he might be selected for both the April 25th and the August 31st tests.]

For each “run” of random data, ten thousand GUIDs are generated, and assigned a number from 1 – 10,000. (These numbers from 1 – 10,000 represent employees eligible for a particular drug test) The ten thousand records are then sorted by the GUID value (which puts the employees in a random order). From there, the top 40% of the records are recorded as ‘selected’. The 40% represents a pull of records from a pool of employees to determine who gets tested.

To summarize, 10,000 records are put in a random order, and then the first 40% of them are used for statistical analysis. This selection of 4,000 records constitutes one “run” of data.

This process of a “run” is done 1,000 times. So, four million (4,000 x 1,000 = 4,000,000) random numbers in the range 1 – 10,000 have been selected.

The next step is to break the numbers between 1 – 10,000 into 400 “buckets”: numbers between 1 and 25 go into the first bucket; numbers from 26 to



Appendix A, Measuring “Randomness” of eScreen’s Random Drug Testing

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50 go in the second bucket; and so on... the 400th bucket consists of numbers from 9,976 to 10,000. Count how many random numbers went into each bucket.

One of the key values needed for doing a Chi-Square test is “How many random numbers would we expect in each bucket?”. 4,000,000 were selected, and there are 400 buckets so we would expect 10,000 numbers in each bucket (4,000,000 divided by 400 = 10,000).

Now we have all the values needed for a Chi-Square Test: 1) the number of buckets; 2) how many in each bucket; and 3) the expected value in each bucket.

An explanation of how a Chi-Square value is calculated is well beyond the scope of this document. If you’re interested, here’s how it is done. Don’t panic, it’s just math. Besides, I didn’t do all that. There are plenty of Chi-Square calculators on the web that will do all that heavy lifting for us. I used the one here. I tested other ones, and got the exact same answers.

Results

The Chi-Square test returns a number between 0 and 1. Any value greater than 0.95 is considered statistically random. The result of this test was: 0.99999995363303. John’s algorithm passes with flying colors.

A Warning: The Long Run v The Short Run

Interpreting these results, eScreen’s selection of employees for drug tests are very, very random. In the long run. Let’s talk about the short run...

Ask an 8 year-old for a number between 1 and 100. She picks 99. Is that random? On average, she should pick 50 or so, but 99?

In small samples of say 100 employees, it is entirely possible, even likely that the same employee gets picked for multiple tests in a row. It’s not that the numbers aren’t random – it’s the small sample size. If you’re only picking numbers between 1 and 100, you are much more likely to be selected than if you’re picking numbers between 1 and 10,000. In the long run, the numbers are very random. In the short run, numbers don’t *seem* so random. That’s how small sample sizes work.



Appendix A, Measuring “Randomness” of eScreen’s Random Drug Testing

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eScreen Drug Tests: Random Selection Process

As part of its random generation process, eScreen uses a computer algorithm developed by its Information Technology Department to produce a selection of employees for random urine tests.

During every selection from a random pool, each employee in the pool is assigned a single-use unique random number (a Globally Unique Identifier [GUID] generated by Microsoft SQL Server) and sorted by that number to determine which employees are selected.

An outline of our automated process follows:

Step 1: A Microsoft SQL Server function is used to generate a pool of unique numbers (the numbers are GUIDs: 128-bit unique numbers generated by a Microsoft program).

Step 2: Each number (GUID) is associated with an employee eligible for random selection for a drug test.

Step 3: The list is sorted by GUID, randomly ordering the employees.

Step 4: Records, based on a percentage set by the customer, are pulled from the top of the randomly generated list to determine selection for the drug test.

From our internal analysis, we believe the algorithm and method described above ensures random selection that is statistically valid.



Attachments

- 1 Attachment 1, TRAN-FM-054, Release of Test Results Form**
- 2 Attachment 2, TRAN-FM-061, DOT Drug Test Request Form**
- 3 Attachment 3, TRAN-FM-018, Return to Duty Agreement Following a DOT Violation**



Document References

- PG&E Employee Code of Conduct:
http://www.pge-corp.com/aboutus/pdfs/code_of_conduct.pdf
- TRAN-2001S Commercial Driver Standard
- TRAN-2005S Drug and Alcohol Testing Standard
- TRAN-2005P-01 Compliance Vendor Audit Procedure
- TRAN-2021P-01 Pre-Duty Procedure
- TRAN-2022P-01 Pre-Employment Drug Testing
- TRAN-2024P-01 Random Pool Report for eScreen Procedure
- TRAN-2030P-01 DOT Qualification Documents for New Commercial Drivers
- TRAN-2035M DOT Policy Handbook for Controlled Substance and Alcohol Testing Program
- TD-4413S Gas Event Reporting Requirements
- TD-4413P-04 Gas Event Reporting Procedure
- Letter of Agreement 04-16
- Letter of Agreement 96-02-ESC
- Letter of Agreement 12-32
- DOT Urine Specimen Publication by DOT:
https://www.transportation.gov/sites/dot.gov/files/docs/Urine_Specimen_Collection_Guidelines_July3_2014_A.pdf
- SAP Guidelines Publication:
<https://www.transportation.gov/sites/dot.gov/files/docs/ODAPC%20SAP%20Guide%20Aug09.pdf>
- Current list of certified labs:
<http://www.samhsa.gov/workplace/resources/drug-testing/certified-lab-list>
- List of labs with approved Electronic Custody and Control Form (eCCF) systems:
<http://www.samhsa.gov/workplace/resources/drug-testing/eccf-approved-list>
- eCCF Notice to Collectors:
https://www.transportation.gov/odapc/eCCF_Collector_Notice
- Approved Alcohol Screening Devices:
<https://www.gpo.gov/fdsys/pkg/FR-2012-06-14/pdf/2012-14582.pdf>
- Approved Evidential Breath (EBT) Testing Devices:
<http://www.gpo.gov/fdsys/pkg/FR-2012-06-14/pdf/2012-14581.pdf>



- Laboratories List
<http://www.samhsa.gov/sites/default/files/workplace/certified-labs-list-october-2016.pdf>
- Certified eCCF Laboratories
http://www.samhsa.gov/sites/default/files/programs_campaigns/division_workplace_programs/eccf-list-august-2016.pdf
- Collection site audit procedure:
https://www.transportation.gov/sites/dot.gov/files/docs/Employer_Collection_Site_Audit_Brochure_1.pdf



Revision 1 Notes – 12/29/2016

Where?	What Changed?
Throughout the manual	Grammar and layout of topics were fixed to make the document more user-friendly and easy to follow
Throughout the manual	Combined the plan for all DOT covered employees (IBEW, ESC, A&T, and management) was included
Throughout the manual	All three DOT agencies (PHMSA, FMCSA, and FAA) are being covered
Throughout the manual	New footnotes were added
Definitions of DOT Agencies	PHMSA, FMCSA, and FAA were added.
Chapter 1, Section 1, Items of Understanding	The topic was updated
Chapter 1, Section 2, Definition of Terms	The topic was updated per regulations
Chapter 2	Covered classifications were included based upon existing criteria in SAP as of today and not reflective of ongoing work regarding classifications
Chapter 3, Section 2, Record Maintenance and Retention	A new topic was added
Throughout Chapter 5	Regulation updates regarding the collection process were made
Chapter 8, Section 1, Guidelines for Reasonable Suspicion/Cause Testing	Minor updates were made to the topic.
Chapter 9, Post-Accident and Post-Incident Testing	A new chapter was created
Chapter 10, Section 1, PG&E's Voluntary Self-Identification Policy for DOT-Covered Employees	FFD Phone number was changed
Chapter 11, Sections 1 and 2, Guidelines for Return to Duty Testing and Guidelines for Follow up Testing	Guidelines for Return to Duty Testing and Guidelines for Follow up Testing were updated



Where?	What Changed?
Chapter 11	Return to duty form was added
Chapter 12, Sections 1 and 2, Refusal to Test	The topics were revised per regulations
Chapter 12, Section 3.1, Shy Bladder	The topic was revised per regulations
Chapter 14: Disciplinary Actions	Throughout the chapter, updates were made to comply with PG&E rules
Definitions of DOT Agencies	Definitions of DOT Agencies was revised per regulations
Appendices, Appendix B	Randomization document was added as an appendix B
Attachments	A new attachments section was created to list forms used by DOT-RC
Document References	All referenced documents were listed
Revision Notes	A revision list was added