



**PLUMBING INDUSTRY  
DRUG-FREE WSA ALLIANCE**

**The Plumbing Industry labor and management partnership to address  
the problems caused by  
drug and alcohol abuse in the workplace.**

## TABLE OF CONTENTS

Introductory Letter

Statement of Purpose

The Policy:

- Introduction
- Prohibitions and Requirement
- Testing
- Consequences
- Reasonable Suspicion Drug Testing
- Traveling Craftsperson and Temporary Assignment

Administrative Rules:

- Guidelines for Specimen Collection Site Drug Testing Cut-Off Levels
- Random Selection Process Protocol for a Positive Test

Apprentice Policy

Attachments:

- I. Fax Form
- II. Participant to Test Notification
- III. Authorization to Test Form
- IV. 1<sup>st</sup> & 2<sup>nd</sup> Non-compliant Employer Letter
- V. 1<sup>st</sup> & 2<sup>nd</sup> Non-compliant Participant Notification
- VI. 3<sup>rd</sup> Non-compliant – Employer Notification
- VII. 3<sup>rd</sup> Non-compliant – Participant Letter
- VIII. 4<sup>th</sup> Non-compliant – Employer Notification
- IX. 4<sup>th</sup> Non-compliant – Participant Letter
- X. Union Unavailable Notification
- XI. Last Chance Agreement
- XII. Non-Compliant Employer Letter
- XIII. Non-Compliant Participant – MAP/EAP
- XIV. Non-Compliant – Failed to Test
- XV. Return to Work Release
- XVI. Union Available Notification
- XVII. Reasonable Suspicion Testing
- XVIII. Protocol for Reasonable Suspicion Testing
- XIX. Retest of Original Specimen

## INTRODUCTORY LETTER

---

TO ALL SIGNATORY EMPLOYERS, CONTRACTOR EMPLOYEES AND UNION MEMBERS:

This program applies to Local 130 members (journeymen and apprentices) employed by all employers who are signatory to an Agreement between PCA Midwest (Plumbing Contractors Association Midwest) and Plumbers Local 130 UA; the WSA (West Suburban Plumbing Contractors Association) and Plumbers Local 130 UA; or the Kankakee & Iroquois Counties Plumbing & Piping Contractors Association and Plumbers Local 130 UA. Included in the testing pool shall be all members, officials and employees of Plumbers Local 130; all employees of all Local 130 Trust Funds (Pension, Welfare and Joint Apprenticeship Committee); and all Employer Association employees (PCA; WSA; Kankakee/Iroquois). This program may also include owners (contractors), sales, clerical, management, maintenance as well as applicants for any such positions provided that the contractor/owner elects to require participation by all non-bargained employees of the company. Contractors who agree and commit to testing all employees (including non-bargained employees) may alter their status for testing all company employees or for testing only bargained-for employees who are Local 130 members by notifying the respective Employer Association's Executive Director of their choice of status by or before June 1 of each year.

The Policy calls for substance abuse testing in three circumstances:

1. Systematic computer selected testing
2. Testing for cause (including post-accident per OSHA requirements)
3. Accelerated testing

In order to guarantee confidentiality, every participating employer is asked to select two Designated Representatives, referred to as Communicators, to handle all Program business. The local Union has Communicators as well for people on Referral. Only these Communicators will be informed about any matters concerning testing.

The systematic computer selection testing process works this way. CDS Services, Inc. (CDS), the plan Administrator that has been selected to administer the program, will send an e-mail to the Communicator informing them to go on-line at [www.cdsonsite.com](http://www.cdsonsite.com) to obtain their list of employees that have been selected for a random/periodic test. The Communicator is asked to inform these participants that they must report for testing by the end of the next business day.

To prove a test was taken, at the time of the testing, the collection site will give the participant a chain of custody form to bring back to the Communicator either at the workplace or at Referral or the Communicator can go on-line at [www.cdsonsite.com](http://www.cdsonsite.com) to determine if the participant has provided a test. The participant is not contacted if the results are negative.

If the test is non-negative, CDS will contact the Communicator, who will inform the participant to contact the Medical Review Officer (MRO) to determine if there is a reason for the non-negative test result. If the final result is positive, the MRO will inform the participant and will contact CDS Services, Inc., who will contact the Communicator to inform him/her that the participant is Non-Compliant.

The Communicator will give the participant Exhibit E, Reinstatement Requirements Form, which provides the phone number for the Member Assistance Program (MAP) or the Employee Assistance Program (EAP) so that an evaluation can be scheduled. The participant is removed from work until the evaluation by the MAP/EAP is completed. Once given notice of "Return to Work" release by the MAP/EAP, CDS Services, Inc. will let the participant and the Communicator know of the permission to return to work.

The Program is designed so that those who test positive for substance abuse will get the help they need. As long as the participant complies with the program there will be no disciplinary action. If, however, the participant does not comply, disciplinary action, as called for under this Policy will be invoked. This action may include termination.

The Policy book has been sent to all participants registered with the program. If more copies are needed, they can be obtained through CDS Services, Inc., the West Suburban Association of Plumbing Contractors (WSA) of Chicago and Cook County, or at the Union Hall.

We hope this packet of information will help you understand the workings of the Program and its policy procedures. Please read the contents of this packet thoroughly to ensure that you understand the program completely. If you have any questions, please contact the Administrator of CDS Services, Inc. at (314) 645-5577.

Sincerely,

James Coyne  
Local 130 Business Manager

George Treutelaar  
Labor Relations Committee Chairman

## **STATEMENT OF PURPOSE**

---

The labor and management representatives of the plumbing industry have formed a partnership to address the problems caused by drug and alcohol abuse. The West Suburban Association of Plumbing Contractors and Local Union 130 have created the Plumbing Industry Drug-Free WSA Alliance (hereafter “WSA Alliance”) to establish and monitor programs designed to address drug and alcohol abuse problems in the plumbing industry.

CDS Services, Inc. will administer the program established by the WSA Alliance. It is the WSA Alliance’s purpose to provide a vehicle to help establish and maintain a workplace free of the destructive effects caused by the use of drugs and alcohol. The WSA Alliance activities are not intended to interfere with normal practices of the union or management. The WSA Alliance recognizes its responsibility to communicate with and educate its participants relative to this policy and the harmful effects of drugs and alcohol in our society and workplace. The WSA Alliance also recognizes the need to facilitate access to programs of assistance to those persons for whom drugs or alcohol may be causing problems. Finally, while not wishing to violate the rights or invade the privacy of any participant, the WSA Alliance drug-testing program will detect those participants who are unable or unwilling to conform to the established program.

Participants who are at-will employees of contractors associated with the WSA Alliance will be subject to internal company disciplinary policies.

The WSA Alliance shall take reasonable measures to safeguard the privacy of participants in connection with this Policy, including maintaining the confidentiality of participants who come forward to discuss alcohol or drug abuse affecting them. Anyone who voluntarily seeks assistance or rehabilitation for alcohol or drug related problems before being asked to submit a test shall be granted amnesty. However, seeking assistance is not a defense to discipline for violations of this policy.

## THE POLICY

---

### INTRODUCTION

Persons who use illegal drugs or abuse alcohol or other controlled substances, on or off their jobs, are likely to be less productive, less reliable, more frequently absent, and to have other work-related problems that can cause increased costs, delays, accidents, injuries, and may damage the health, safety and well-being of other workers on the job. The construction industry can control and reduce this problem by taking several specific steps:

- Recognition of the problem;
- Development of a comprehensive policy;
- Implementation of a program of education and information;
- Promotion of an assistance program;
- Implementation of fair and respectful drug testing that conforms to federal drug testing program guidelines.

Any effort to control and reduce the negative consequences of drug use and alcohol misuse in the construction industry must be done with the utmost confidentiality and respect for the participant.

In order to enhance substance abuse awareness among all those involved, educational seminars and training programs will be offered. The educational seminars will be directed toward education of all participants about the seriousness of the problem of drug and alcohol abuse in this country and how the use of drugs and alcohol negatively impacts safety, productivity, and the competitive ability of the American workforce.

Participants who may serve in supervisory positions will receive specific training intended to assist them in identifying problem situations and/or warning signs of impairment. In addition, these training sessions will clarify their responsibility to document, intervene and follow up with the troubled participant. The discussion of intervention will provide specific guidance on how to comply with the management responsibilities associated with all aspects of the drug-testing portion of the program. These sessions will be offered on a scheduled basis, sufficient to satisfy the training requirements of all employers and are available on-line at [www.cdsonsite.com](http://www.cdsonsite.com).

The WSA Alliance encourages all participants troubled by their own or a family member's drug or alcohol abuse to seek professional care and treatment. Early recognition and treatment of alcohol and drug abuse provides the greatest opportunity for successful recovery. Current participants will be referred to the Member Assistance Program/Employee Assistance Program (MAP/EAP) as a result of a non-compliant test. The content of the discussion with the MAP/EAP will be protected and confidential. A participant, who seeks the services of the MAP/EAP on his/her own, will never have his/her use of the program brought to the attention of the WSA Alliance or any of its subscribing organizations or participants. Participants, who use the MAP/EAP as a consequence of a non-compliant test, will be subject to the conditions established in the testing portion of this policy.

The MAP/EAP provides confidential assistance to participants and their dependents that are experiencing substance abuse or an alcohol-related problem in their own lives. The MAP/EAP staff has knowledge of the level and types of benefits available to the WSA Alliance participants.

Participants can access the services of the MAP/EAP through a hotline that is staffed twenty-four (24) hours a day, seven (7) days a week, throughout the entire year. Participants calling the MAP/EAP hotline are put in touch with a counselor who will conduct a professional assessment and may meet with them to further assess the nature of the problem in order to provide the best and most appropriate level of care. Certified and credentialed human service professionals who are sensitive to the needs of the participant, staff the MAP/EAP. Participants who take the initiative to contact the MAP/EAP for assistance do so with the assurance that their calls will be treated respectfully and confidentially.

WSA and the Plumbers Union Local 130 shall approve any amendments to this policy.

## **PROHIBITIONS AND REQUIREMENTS**

---

Participants must adhere to each of the following rules and regulations:

1. All those applying for employment, union membership or placement in the apprentice program with any employer or local union shall be subject to pre-employment testing by way of a hair follicle and urine analysis.

Upon a legitimate positive test result the applicant will be denied employment, union membership or entry to the apprentice or training program. Those applicants that have been denied under this section will be ineligible to reapply for a period of one year from the date of denial, or upon verified completion in a MAP/EAP designated program at the individuals' expense.

2. The use of alcohol or drugs by employees during working hours or on the job site or on company property (including company vehicles) is absolutely prohibited.
  - a) The term "use" means consuming, possessing, selling, transferring, concealing, distributing or arranging to buy or sell, being under the influence of, or reporting for duty under the influence of alcohol or drugs as set forth in this policy, or having illegal drugs in one's possession.
  - b) The term "alcohol" means any form of alcohol including ethanol. The term "drug" means any intoxicating substance, narcotic plant or similar substance identified under the Controlled Substances Act or similar state law. The term "drugs" includes prescribed medications not used in accordance with a valid medical prescription.
  - c) Notwithstanding any other provision in this policy, the use of prescription medications in accordance with a lawful prescription and the use of over-the-counter medications are not violations of this policy. However, marijuana and its active ingredient THC are illegal under federal law and accordingly are included in this definition of drug notwithstanding any use that might be permissible under Illinois law.
  - d) The term "working hours" means all the time in which employees are engaged in work duties or subject to the control of the Company, and also includes meal periods, scheduled breaks and travel to work or from one workplace to another. Social events voluntarily attended during non-working hours are not covered under this policy.
  - e) The term "company property" means all facilities, job sites, vehicles and equipment that are owned, leased, operated or utilized by the Company or its employees for work-related purposes, including parking areas and driveways, as well as lockers, toolboxes or other storage areas used by the employees. It also includes other public or private property, facilities, vehicles and equipment located away from the Company facility if the employee is present on such property for a work-related purpose.
  - f) Participants who have drugs or alcohol in their system at or above the cutoff values specified in the Administrative Rules are under the influence.
  - g) The term "accelerated testing" means any follow-up testing recommended by the evaluator.

3. In order to enforce this policy, participants shall be required to submit to drug and/or alcohol testing in accordance with this policy. Except as otherwise provided in this policy, no participant will be tested for alcohol unless there exists a reasonable suspicion that the person is under the influence of alcohol, or they are involved in an OSHA recordable on-the-job accident. Testing for these two reasons will only be done by evidential breath testing device (breathalyzer).
4. Any participant who is convicted of a drug or alcohol crime occurring in the workplace or while on company assignment and who is employed by an WSA Alliance affiliated employer must report this information to his/her immediate supervisor no later than five (5) days after such conviction. The supervisor must convey this information to the appropriate employer representative.
5. Participants subject to this policy continue to have access to the usual protections provided as a part of their union membership and/or as members of bargaining units covered by collective bargaining agreements. If a participant is aggrieved by any action taken under this Policy and his/her complaint cannot be resolved the complaint may, if the participant or Union requests, be referred as a grievance under the grievance and arbitration provisions of the participant's collective bargaining agreement. In the event the matter is referred to arbitration, the provisions of this Policy shall bind the arbitrator substantively.

## **TESTING**

---

All participants of the WSA Alliance affiliated employers will be subject to the WSA Alliance program, and will be tested at least once, but not limited to one occasion during each 24-month period. Testing will be done through a computerized selection program.

Testing will take place on a regular basis. Participants selected for random/periodic testing will be instructed to report to a participating collection site by the end of the next business day. Their employer will give employees one hour off with regular pay and fringe benefits. If the participant is currently unemployed he/she will receive a dollar amount equal to one-hour regular pay with fringe benefits from the WSA Alliance. The employer will provide the participant with the names of collection site locations. The participant will receive a chain-of-custody form and an Employee Notice of Policy, Consent and Release form (Exhibit A) from the employer or at the collection site. Alternatively, for electronic chain-of-custody forms, the employer can provide an authorization code to be given to the collection site by the participant. Whenever a participant is directed to submit to a test, the participant should contact the collection site to verify the site's hours of operation and notify the collection site at the time of testing that he/she are testing under the WSA Alliance Program. A copy of the Notice of Policy, Consent and Release Form appears as Exhibit A. (Exhibit A must be faxed back to the Administrator at CDS Services, Inc., Inc.)

Participants may also be tested if there is "reasonable suspicion" to suspect that a participant's work performance or on-the-job behavior is affected in any way by drugs or alcohol. (See Exhibit D)

To implement an appropriate and acceptable program, the WSA Alliance has adopted six (6) safeguards that reflect the standards established by the U.S. Department of Health and Human Services (DHHS) and the National Institute of Drug Abuse (NIDA). Those safeguards are as follows:

1. The integrity of collected urine specimens will be insured by utilization of one collection procedure at all sites. Samples will be collected in accordance with federal standards that provide for a continuous chain of custody and which recognize privacy concerns regarding the

participants being tested.

2. Carefully selected accredited laboratory that have also obtained and retained DHHS certification will conduct testing.
3. All drug tests that screen non-negative must be confirmed by gas chromatography/mass spectrometry (GC/MS).
4. A Medical Review Officer (MRO) will review all non-negative drug test results received from the laboratory prior to confirming the test result as positive. The MRO is a physician with specialty training and expertise in substance abuse and drug testing. The MRO will review non-negative test results to insure that proper procedure, protocol, and reporting is done. The MRO will interview the person with a non-negative test result by telephone to assess whether any legitimate explanation exists for the non-negative test result. The participant must contact the MRO by telephone to discuss the non-negative test result received from the laboratory. The MRO also notifies participants that they will have three working days from the date they are notified of their result to make and support any explanations or rebuttal they have for such results, and will have five working days from the date they are so notified to request, and make satisfactory arrangements to pay for a retest. If the participant with non-negative lab result does not contact the MRO after 24 hours, the MRO will notify the Administrator of CDS Services, Inc. that the participant has been ruled as an administrative positive.
5. Urine samples will be separated into two containers at the time the sample is collected. One portion of the original urine sample shall be kept secure and chemically stable and made available for verification of laboratory testing results. Diluted specimens will be considered invalid and the participant will be required to immediately submit to another test. Unsuitable specimens will be considered invalid and the participant will be required to discuss the unsuitable result with the MRO and immediately submit to another test under observation. A participant may be removed from active duty for a diluted or unsuitable specimen. Adulterated and substituted specimens will be considered as a positive test result and the participant will be removed from active duty and not eligible for referral or rehire until the participant is evaluated by the MAP/EAP and has initiated or completed the recommended treatment program. The WSA Alliance uses U.S. Department of Health and Human Services guidelines to determine when specimens are adulterated, diluted, unsuitable or substituted. All drug test positive samples will be retained in a locked frozen facility at the testing laboratory for one year. The retained urine samples will be available should the results of that test be disputed or should arbitration or litigation arise out of the actions taken because of the test results.
6. Employees who have confirmed medical conditions that do not permit them to provide a valid urine specimen (for example, employees on diuretics, employees required due to medication or other conditions regularly to consume large amounts of fluids, employees undergoing dialysis) will be permitted to satisfy the testing requirements through alternative means of testing such as blood or saliva testing. These arrangements will require medical documentation and will be considered on a case-by-case basis.

On a periodic basis, the WSA Alliance, through CDS Services, Inc., will submit blind pre-tested urine samples with appropriate documentation to the drug-testing laboratory as a means of assuring laboratory proficiency.

As a further protection to the six (6) listed safeguards and the representation described above, the WSA Alliance reserves the right to contract the services of a toxicologist or other appropriate independent professional to audit the collection facilities and the drug-testing laboratory as deemed necessary. The purpose of this audit shall be to insure that guidelines developed to protect the

---

Administered by CDS Services, Inc.  
2348 Hampton Ave., St. Louis, MO 63139  
(314) 645-5577  
www.cdsonsite.com

participant's rights, the interest of the WSA Alliance, and all those affiliated with the WSA Alliance are rigorously adhered to and to insure that those procedures used to conduct drug testing continue to meet or exceed the standards of performance established by federal guidelines.

## CONSEQUENCES

---

1. Participants who test non-compliant shall be required to comply with the following:
  - a. Upon a first non-compliant test, the participant will be referred to the MAP/EAP for an evaluation and must complete the recommended treatment or education program, which will include accelerated testing. See Exhibit E.
  - b. Upon a second non-compliant test within a two-year period, the participant will be referred to the MAP/EAP for an evaluation and must complete the recommended treatment or education program. In addition, the participant will be placed in the accelerated testing program for one year following his/her return to work. See Exhibit E.
  - c. Upon a third non-compliant test within a two-year period from the preceding (second) test, the participant will be referred to the MAP/EAP for an evaluation and must complete the recommended treatment or education program. In addition, the participant will be placed in the accelerated testing program for one year following his/her return to work.
  - d. Upon a fourth non-compliant test within a two-year period from the preceding (third) test the participant will be referred to the MAP/EAP for an evaluation and must complete the recommended treatment or education program. In addition, the participant will be placed in the accelerated testing program for one year following his/her return to work. The participant shall be terminated from employment and, if the referral procedure policy provides, shall be ineligible for referral until he/she has satisfactorily completed the assigned treatment or other program.
  - e. The two-year period described (in a through d) above is a rolling two-year period, which commences on the date of any non-compliant test.
2. As outlined herein, a first or second non-compliant test shall not be the sole basis for termination. However, participants who are in non-compliance with the WSA Alliance program will be removed from active duty and are not eligible to return until the MAP/EAP evaluates the participant and the participant has initiated or completed the recommended treatment program. For purposes of this provision, "non-compliance" shall be determined by the Administrator and shall mean:
  - a. Failing to take a test as scheduled
  - b. Failing to keep a scheduled appointment with the MAP/EAP
  - c. Failing to participate in and/or complete the assigned treatment or education program.
  - d. Substituting another substance or specimen for their urine specimen (including their own previously excreted urine)
  - e. Providing a dilute specimen for a second time without a valid medical explanation

- f. Providing a urine specimen that shows the presence of an adulterant
  - g. Testing positive.
- 
- 3. Where the program's MAP/EAP recommends treatment or education, the participant may nevertheless return to work or be referred from the "out of work list" once a return to work release has been obtained from the MAP/EAP.
  - 4. Discipline of bargaining unit members for policy violations addressed or not expressly addressed in this policy shall be in accordance with the Collective Bargaining Agreement. The grievance procedure shall be made available to all collective bargaining personnel. Non-collective bargaining personnel shall be subject to internal company discipline procedures.
  - 5. Nothing in this policy shall be construed to authorize any action that is unlawful under federal or state law.

## **REASONABLE SUSPICION TESTING**

---

The "reasonable suspicion" standard is applicable to, but is not limited to, any on-the-job accident, particularly where there is a fatality, serious bodily injury or significant property damage.

Reasonable suspicion testing, or testing based on abnormal or unusual behavior or other circumstances sufficient to lead a reasonable person to suspect that a participant is using under the influence of, or is in possession of an intoxicant shall be established by an immediate supervisor and should be confirmed by one other supervisor whenever feasible. The immediate supervisor shall document, in writing, the incident and the reasonable cause basis for such testing. The documentation shall specifically detail the actions of the participant, the location, date, time, length of observation, any witnesses, and should be signed by the supervisor who witnessed the incident. See Exhibit D.

Participants who are union members subject to this policy continue to have access to the usual protections provided as a part of their union representation/membership. If a participant is aggrieved by any action taken under this Drug Policy and his/her complaint cannot be resolved, it may be, if the participant or Union requests referred as a grievance under the grievance and arbitration provisions of the participant's collective bargaining agreement. The arbitrator shall be bound substantively by the provision of this Drug Policy.

Refusal to take the reasonable suspicion test or failure to comply with all necessary elements of the testing program may result in the participant being disciplined up to and including discharge by the WSA Alliance affiliated employer. Participants who as a result of testing for reasonable suspicion, lose time from work while awaiting the test results, and who are found to be negative or below the established levels of prohibited substances in their specimens, shall be reimbursed at their applicable rate of pay for lost time from work by the participant's respective employer.

Any participant who disputes positive results shall have the right to have his/her initial sample independently re-tested by a DHHS certified laboratory of his/her choice, at his/her own expense, within five working days of when he/she was notified of the test results. A portion of the initial sample shall be forwarded under chain-of-custody directly by the WSA Alliance testing laboratory to the laboratory selected by the participant. Evaluation of the drug test must be performed by a qualified MRO approved by the WSA Alliance. If the second lab report test reveals negative results, then both tests will be considered negative. Under these circumstances, the affiliated contractor/employer has agreed to reimburse the participant for compensation lost during the period of his/her removal and the WSA Alliance will reimburse the participant for the cost of the second test.

A participant whose positive test results are confirmed will be referred to the MAP/EAP by the MRO. The participant is expected to attend all appointments with the MAP/EAP counselor and comply with treatment recommendations.

---

## **TRAVELING CRAFTSPERSON AND TEMPORARY ASSIGNMENT**

---

There may be times when certain jobs require the recruitment of traveling craftsperson. It is the position of the WSA Alliance that all traveling craftsperson be subject to both initial and random testing. This provision will also apply to those individuals working under the portability rules. In order to avoid situations wherein a craftsperson will be forced to have one (1) or two (2) uncompensated days while waiting for the results of the initial urine drug screen to be reported, traveling craftsperson will be allowed to report to work immediately after providing a urine specimen for testing. The craftsperson understands and accepts that should his/her urine test positive for any prohibited substance; their employment will be summarily terminated without obligation or further compensation. Such termination shall also be subject to the participant's rights under his/her collective bargaining agreement.

Participants who are called to work assignments that are anticipated to last three (3) days or less are subject to the WSA Alliance drug-free workplace policy, but may be exempt from the drug-testing program. If the assignment subsequently exceeds three (3) days, or if the participant accumulates more than three (3) days, the participant becomes subject to the drug-testing program.

Participants will be allowed to remain at work after three (3) days if they provide a urine sample for testing. Should the test be reported as positive, the participant shall be subject to discipline up to and including termination by the WSA Alliance affiliated contractor, subject to the participant's rights under his/her collective bargaining agreement.

---

## **ADMINISTRATIVE RULES**

---

### **GUIDELINES FOR SPECIMEN COLLECTION SITES**

The urine collection process will follow to the extent and in the manner provided in DHHS guidelines.

1. The participant will be asked to provide picture identification (Company identification card, driver's license, etc.) to the attendant at the collection site.
2. Participants who want a hard copy of their drug test results may send a notarized request and a certified check for \$15.00 to CDS Services, Inc., 2348 Hampton Ave., St. Louis, MO 63139. The request should include their name and Social Security number.
3. If the drug test is for reasonable suspicion purposes and not random, the supervisor or another manager is required to accompany the participant to the specimen collection location. A union representative or steward may also accompany the participant along with a supervisor or manager. Upon arrival at the collection facility the following procedures apply for drug testing:
  - a) Participant should be escorted to a collection room and asked to provide an unadulterated urine specimen in the collection cup provided.
  - b) The cup should be filled to 60 ml.
  - c) The specimen cup should be returned to the medical technician who will witness the participant initialing and dating the integrity seals placed on the specimen.
  - d) Verify the proper spelling of the participant's name as recorded on the log sheet.
  - e) Verify that the participant's social security number has been properly recorded.

- f) Verify that the chain-of-custody form number placed on the specimen bottle is the same as that on the chain-of-custody form.
4. The following procedures apply for alcohol testing. Alcohol testing will not be done on a random basis.
- a) Alcohol testing shall be conducted in a location that affords visual and aural privacy to the individual being tested.
  - b) The participant is required to show proper identification when arriving at the test site. The Breath Alcohol Technician (BAT) shall then explain the testing procedure to the participant.
  - c) The BAT must supervise only one participant's use of the Evidential Breath Testing device (EBT) at a time. The BAT is not to leave the testing site while the test is in progress.
  - d) An individually sealed mouthpiece shall be opened in view of the participant and attached to the EBT.
  - e) The BAT shall instruct the participant to blow forcefully into the mouthpiece for at least (six) 6 seconds or until the EBT indicates that an adequate amount of breath has been obtained.
  - f) If the result is 0.02 or greater, a confirmation test must be performed as provided.
  - g) The confirmation test shall be conducted within 15 minutes of the completion of the screening test.
  - h) A new mouthpiece must be opened and used for the confirmation test.
  - i) The confirmation test result is deemed to be the final result upon which any action under operating administration rules shall be based.
5. If the test is for reasonable suspicion purposes and not random, after the appropriate specimens have been collected, the company supervisor will then take the participant home or to another safe place. In no instance should the participant be allowed to drive home on his/her own. All reasonable effort, short of force, should be used to convince the participant that his/her should be taken home, including contact with family members, taxi service, etc. If it appears that the participant will attempt to operate a motor vehicle, and all reasonable attempts short of force have failed to dissuade the participant, the proper authorities should be called and advised of the situation.
6. Immediately after return to the work location, the company supervisor should complete all documentation and prepare a report of all of the events that occurred from the initial observation of reasonable suspicion through the testing process and the disposition of the participant. This report should be sent to his or her immediate supervisor directly following the incident or in any event on the same day. See Exhibit D.

## DRUG TESTING CUT-OFF LEVELS

These levels may be modified by the WSA Alliance to remain consistent with the Department of Health and Human Services guidelines or customary practices in the testing industry.

The drug-testing program will be directed at the detection of the following drugs at these established levels:

DRUG GROUP	DRUG OR METABOLITE DETECTED	INITIAL TEST LEVEL NG/ML	GC/MS Confirmation
AMPHETAMINE	Amphetamine	1000 NG/ML	500 NG/ML
	Methamphetamine	1000 NG/ML	500 NG/ML
COCAINE	Benzoylcegomine	300 NG/ML	150 NG/ML
MARIJUANA	Delta 9 THC, 9 COOH	50 NG/ML	15 NG/ML
OPIATE	Codeine	2000 NG/ML	2000 NG/ML
	Morphine	2000 NG/ML	2000 NG/ML
PHENCYCLIDINE	PCP	25 NG/ML	25 NG/ML
BARBITURATES	Diverse	300 NG/ML	200 NG/ML
BENZODIAZEPINE	Oxazepam	300 NG/ML	200 NG/ML
METHADONE	Methadone	300 NG/ML	200 NG/ML
METHAQUALONE	Methaqualone	300 NG/ML	200 NG/ML
PROPOXYPHENE	Propoxyphene	300 NG/ML	200 NG/ML

An alcohol test for post-accident or for cause will be done by Breathalyzer testing and will be a reported positive at a concentration of .02 or higher.

## **RANDOM/PERIODIC SELECTION PROCESS**

Participants will be selected randomly from the 50% pool. The names of selected participants will not be returned to the pool, so that every two years all employees will have been tested at least once. At the same time all participants will be part of a second pool, referred to as the periodic pool, in which 10% of the participants will be selected for testing each year. Participants in the 10% pool can be selected for testing at any time even if they have been selected recently from the 50% or 10% pools.

## **PROTOCOL FOR A POSITIVE TEST**

1. Upon verifying that a drug test is a confirmed "positive," the MRO will contact CDS Services, Inc. notifying them of the positive test result. CDS Services, Inc. will contact the Communicator who will provide the Reinstatement Requirements to the participant. If the participant chooses not to utilize the MAP/EAP or not to follow the MAP/EAP's recommendation, he/she will be required to wait for thirty (30) days from the date of initial contact with the MRO before being allowed to test again. During this thirty-day waiting period, the participant must be terminated by the contractor and is ineligible for referral. See Exhibit E.
  2. Upon making the phone call to the MAP/EAP, the participant will be set up for an evaluation appointment. During the evaluation, the MAP/EAP counselor will request that the participant sign a release authorizing MAP/EAP communication with CDS Services, Inc. regarding contact and cooperation. If the participant chooses not to sign the release, utilize the MAP/EAP or follow the MAP/EAP's recommendation, he/she will be required to wait for thirty (30) days from the date of initial contact with the MRO before being allowed to test again. During this thirty-day waiting period, the participant must be terminated by the contractor and is ineligible for referral. (See Exhibit E)
  3. Once the participant agrees to the MAP/EAP program he must complete it or be considered non-compliant. The participant may no longer wait out 30 days.
  4. Once the MAP/EAP counselor feels the participant is ready to return to work, the counselor will determine a drug-testing regimen, the first test of such regimen being used as one factor in the return to work criteria.
  5. The MRO will be brought back into the process with the occurrence of a subsequent "positive" test.
-