



I.M.P.A.C.T.

“Revised “

SUBSTANCE ABUSE TESTING POLICY

Part I

&

PROCEDURE MANUAL

Part II

REVISED

June 2011

**Revised Substance Abuse
Policy – Part I
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Statement of Policy

The signatory parties recognize that substance abuse is an illness that creates serious problems for workers, their families, the workplace and the community; that this illness acknowledges no boundaries of age, race or socioeconomic status; that punishing the victim will not eradicate the problem. When dealing with substance abuse, efforts must be made to focus on substance abuse education and behavior modifications as well as reasonable sanctions in order to assist the individual to become a more productive person. Therefore, efforts must focus on treatment of the illness and restoration of the victim to a meaningful productive life.

The signatory parties recognize that a cooperative and constructive effort is needed to overcome the impact of substance abuse on safety, productivity, quality of work, and morale.

The signatory parties recognize that Federal law requires that all contractors who receive Federal contracts or grants maintain a drug free workplace. The signatory parties service Federal and State Contractors and firmly believe that the work environment, at all times, should be healthy, safe and hazard free. We will enforce the requirements of the Federal and State Law in order to maintain a drug free workplace.

Also, the signatory parties recognize the keys to this effort will be the providing of education, assistance to the employees and families, encouraging the employees to receive treatment as needed, fostering and encouraging an environment which produces a high skill quality product that is “drug free”. Therefore, in implementing the principles stated above, the parties agree, as follows, to this program and will cooperate to accomplish a drug free environment and a safe work place.

Revised Program Structure

The IMPACT Substance Abuse Program is a cooperative program intended to encompass both management and labor. The goal of the IMPACT Pilot Program is to provide a safe work environment for all parties. The program recognizes an employee test performed within the last 12 months as a valid pre-employment test. Standardized procedures and a shared eligibility pool enable a member's current test to:

- **Serve as a valid pre-employment test for one or many contractors**
- **Satisfy a contractor's requirements for hiring a worker to a job site**
- **Prevent a worker who is not in the eligibility pool from working on drug-free projects until they obtain a proper program test**

Signatory Parties of the pilot program have access to an online verification system to confirm that workers are in the eligibility pool. Workers not in the pool are not hired until they get a program test or complete the rehabilitation requirements. It is the contractor's responsibility to verify that a worker has a valid pre-employment test.

The program utilizes an independent third party to perform program testing, enforce the program requirements, and provide the 24-hour online database. The program is audited regularly through the comprehensive reporting capabilities of the third party administrator.

Online Verification System

www.impact-net.org

IMPACT has provided a service that will enable Ironworker Local Unions and Signatory Contractors to verify that an employee has a valid program test at any time, 24 hours a day, 7 days a week via the Internet. This service is an online verification system that is accessible through the IMPACT website at www.impact-net.org.

The verification system is firewall and pass code protected. Only a worker's eligibility is available through the system. All confidential participant information is contained within the database managed by the third party administrator and cannot be accessed by Ironworker Local Unions or Signatory Contractors for any purpose.

All Ironworker Local Unions and Contractors that are signatory to the IMPACT Substance Abuse Program shall be granted an access code to enter the verification system. After supplying a series of pass codes, worker eligibility can be validated.

In the instance that an Ironworker Local Union or a Signatory Contractor is unable to access the verification system via the IMPACT Webster, eligibility information may be requested directly from Mobile Medical Corporation, the Third Party Administrator, at 1-718-777-8358. The online verification system may also be accessed through Mobile Medical Corporation's website at www.mobmed.com.

Revised Program Requirements

The Ironworker-Management Progressive Action Cooperative Trust Substance Abuse Revised Program was developed by labor and management for areas of the country with unique needs. It may be implemented by a contributing Ironworker Local Union and their Signatory Contractors if they meet certain requirements.

The Revised Program will be conducted in keeping with the established testing procedures developed by the Department of Health and Human Services Scientific and Technical Guidelines dated April 11, 1988, and any subsequent amendments thereto.

1. Laboratory Certifications

The Laboratory shall be licensed or certified, as the case may be, by the Substance Abuse and Mental Health Services Administration (SAMHSA) and the College of American Pathologists and shall participate in the proficiency testing programs required by each of those respective organizations. The laboratory shall store frozen all samples reported as positive for 365 days and all samples reported as negative for 5 days.

2. Methods of Testing

All samples for testing will be taken by appropriately qualified personnel. The primary methods of testing are:

1. Drug Screens -

- a. Primary Method: Instant/rapid urine drug screen with laboratory analysis of all instant results. The instant test device must be FDA approved, cover the required ten panels and also test for adulterants and specific gravity. The instant specimen will then be sent to the lab for initial screening by immunoassay and require Gas Chromatography/Mass Spectrometry (GC/MS) for confirmation.
- b. Secondary Method: Urine laboratory analysis split into two samples. The initial screening will be by immunoassay and require Gas Chromatography/Mass Spectrometry (GC/MS) for confirmation.

2. **Alcohol Tests** - will be administered using blood, breath or saliva and confirmed using an approved breath testing device.

In the case of post-accident or for cause testing, an onsite test may be used. All negative and non-negative results but must be confirmed with a standard confirmation test. (i.e. GC/MS or EBT)

All handling and transportation of each specimen will be properly documented through strict chain of custody protocol.

To the greatest extent possible, the privacy of the employee will be preserved.

3. Test Panel – Cut-Off Levels

Urine drug screening and Gas Chromatography/Mass Spectrometry (GC/MS) confirmation for ten (10) categories of drugs will be required at or above the following cut-off limits.

Drug Class	Screening Cut-Off Limit (ng/ml)	Confirmation Cut-Off Limit (ng/ml)
Amphetamines	1000*	500*
Barbiturates	300	300
Bezoylecgonine (Cocaine)	300*	150*
Cannabinoids (THC)	50*	15*
Opiates	300*	2000*
Phencyclidine	25*	25*
Benzodiazepines	300	300
Methadone	300	300
Propoxyphene	300	300
Oxycodon (Oxycotin, Percodan, Percocet)	100	300

The instant test panel includes the following ten (10) categories of drugs and cut-off limits:
(Methamphetamine is listed as a separate panel with the instant test but is included in the testing panel for amphetamines in the urinalysis test panel)

Drug Name:	Abbr:	Cutoff:
Amphetamine	AMP	1000ng/mL
Barbiturates	BAR	300ng/mL
Benzodiazepines	BZO	300ng/mL
Cocaine	COC	300ng/mL
Marijuana	THC	50ng/mL
Methadone	MTD	300ng/mL
Methamphetamine	mAMP	1000ng/mL
Opiates	OPI	2000ng/mL
Oxycodone	OXY	100ng/mL
Phencyclidine	PCP	25ng/mL
Propoxyphene	PPX	300ng/mL

Alcohol**

0.04% BAC

0.04% BAC

****The presence of alcohol equivalent to 0.02% to 0.039% BAC in any participant test regulated by the DOT will result in that individual being removed from duty for at least eight (8) hours or one work shift, whichever is longer.**

*Cut-off limits meet or exceed those established by the Department of Health and Human Services in their mandatory Guidelines for Federal Workplace Drug Testing Programs. There are no SAMSHA recommended screening cutoff levels for Propoxyphene, Barbiturates, Benzodiazepines, Methadone and Oxycodone. Cut off levels for these panels are industry standards.

3.1 Alcohol Screening

Alcohol testing may be included with Reasonable Suspicion and Post Accident tests and shall be performed according to established federal guidelines. An alcohol test may also be included with a random test as required by owners.

4. Adulterated Specimens

An adulterated specimen will be considered a positive drug screen. Before consideration for testing again, IMPACT will require a donor with an adulterated specimen to comply with the rehabilitation requirements of the program.

5. Dilute Specimens

A dilute specimen with a valid, negative laboratory result shall be treated as a negative program test. A dilute specimen with a MRO confirmed positive laboratory result, shall be treated as a positive program test.

Recollection of a dilute specimen shall be deemed necessary only when creatinine concentration of the original specimen is equal to or greater than 2mg/dL, but less than or equal to 5mg/dL.

6. Observed Collection

Is not required for non-federal test collections and IMPACT does not condone this collection request. On jobsites that are federally mandated the IMPACT program does not have jurisdiction and a member may be subject to a direct observed collection (the collector or an observer accompanies the donor into the stall/toilet area and observes the act of urination) may occur under only very specific circumstances.

7. Program Test Types

Testing may be initiated under the following circumstances. A refusal to test is considered a positive test and the individual will be subject to rehabilitation requirements and reinstatement procedures.

7.1 Pre-Employment Test – If a member does not have a current test in the IMPACT system they must take a pre-employment test prior to going to work. The pre-employment test is an instant/rapid test with lab confirmation on all results.

7.2 Random Testing – Only members who are employed will be subject to unannounced testing every four to six weeks. Each contractor will assign a Designated Representative “DR” that will work in conjunction with the TPA and the members.

Participants of the revised program are subject to random testing every four to six weeks. The TPA will contact participating contractors who can choose which option best fits their needs:

Collection Facility -

Day 1 - The TPA contacts the contractor DR with the selected random information.

Day 2 - The DR provides list of members employed who are selected

Day 3 – DR notifies his employees who are selected and they must go to an authorized collection facility and test by the end of the day. When an Ironworker is alerted to test the contractor is obligated to provide reasonable accommodations to get their test completed.

Job Site - A job-site with ten (10) or more Ironworkers is eligible. All Ironworkers on the job-site can be tested (up to 100%). The TPA will work with the DR to obtain the necessary information about the job including the jobsite employee list.

Owner Request - An Owner may request that Ironworkers on the job be randomly tested. All contractors on the job site must provide payroll records to the TPA at the time of the random request as verification of workers employed on the site.

- 7.4 Post Accident*** - An employer may require a participant to submit to a test after the involvement in, or cause of an accident, which causes injury to the participant or another party. The employer shall also require the same above testing of a participant who is involved in, or cause of an accident, which causes damage or destruction to property (to include a serious near miss).
- 7.5 Reasonable Suspicion / For Cause*** - A test may be administered in the event a trained supervisor has a reasonable cause to believe that the employee has reported to work under the influence, or is or has been under the influence while on the job; or has violated this drug policy. During the process of establishing reasonable cause for testing, the employee has the right to request his onsite union representative to be present. If on-site representation is not available, all efforts will be made to contact representation from the employee's union.
- 7.6 Return to Duty** – The return to duty test is required for a participant to reinstate into the program eligibility after a positive test. The cost of the return to duty test will be paid by IMPACT unless the test result is a non-negative.
- 7.7 Accelerated Random Testing** – The participant will be subject to a minimum of four (4) additional random tests, or greater, as prescribed by the Employee Assistance Program (EAP) for a period of one year as a condition of further employment.

The frequency of program testing may be increased based on requirements legitimately mandated by owners.

* In the case of accident or for cause testing, an instant on-site screen or oral saliva test may be used, administered by a qualified supervisor, all tests will be confirmed with a standard confirmation test are required (i.e. GC/MS or EBT). If the initial onsite screen is positive, the participant will be removed from the job site pending the GC/MS confirmation. In the case that on-site testing is unavailable, and laboratory analysis is performed, a participant shall be removed from the job site pending the laboratory result. If the confirmation of the on-site test or the laboratory test is negative the participant shall be reinstated and reimbursed by IMPACT for lost wages.

8. Medical Review Officer (MRO)

A Medical Review Officer (MRO) is a licensed physician who has knowledge of substance abuse disorders. The MRO must be certified by either the American Association of Medical Review Officers (AAMRO) or the American College of Occupational and Environmental Medicine (ACOEM). The MRO shall:

- a. Review and verify a laboratory positive test result.
- b. Contact the individual within 24 hours to discuss the reasons why their test result might be positive.
- c. Review the individual's medical record as provided by or at the arrangement of the tested individual as appropriate.
- d. Confirm the laboratory result.
- e. Notify the Third Party Administrator (TPA) of all tests results, positive and negative.

All records of tests reviewed by the MRO and supporting documentation will be forwarded to and maintained by the TPA.

9. Substance Abuse Professional (SAP): A licensed physician (Medical Doctor or Doctor of Osteopathy), a licensed or certified psychologist, a licensed or certified social worker, or licensed or certified employee assistance professional. Additionally alcohol and drug abuse counselors must be certified by the National Association of Alcoholism and Drug Abuse Counselors (NAADAC) Certification Commission, a national organization that imposes qualification standards for treatment of alcohol and/or drug related disorders. All must have knowledge of and clinical experience in the diagnosis and treatment of substance abuse-related disorders.

10. Request for Re-analysis

In the case of “positive” results of any test, the participant, at his/her own expense and paid for in advance, shall have the right to have the original Split Specimen “B” sample independently reanalyzed by a laboratory of their choice within 72 hours. The laboratory must meet the qualifications as stated in the policy. **If a donor did not provide specimen quantities required for a split specimen (45-60ml) the donor will waive their right to have the “B” sample reanalyzed but may use the original “A” sample.*

If the independent reanalysis is “negative”, the participant will be reimbursed for the cost of the independent test and any lost wages by IMPACT.

If the independent reanalysis is “positive”, the participant will be notified by the MRO, and will be required to comply with the rehabilitation requirements. All expenses related to the reanalysis of the original sample and any lost wages will be forfeited.

The participant shall have the right to secure a copy of all data relating to the test procedures and results, providing the costs of same are paid in advance to the initial testing laboratory by the participant.

11. Rehabilitation Requirements

A participant who has a confirmed positive test result or who does not comply with the program requirements will not be eligible to participate in the program until they are evaluated by the Employee Assistance Program (EAP) and complete the program rehabilitation requirements.

First Violation: The individual will be ineligible from working for any IMPACT Signatory Contractor for a minimum of 30 days. To be eligible to return to work, the participant must be evaluated by a substance abuse professional, provide written proof of successfully completing a medically recognized rehabilitation program and submit a negative return to duty drug screen. The participant will be subject to a minimum of four (4) accelerated random tests for a period of one year as a condition of further employment. Frequency of the accelerated random testing is to be determined by the SAP.

Second Violation - The individual will be ineligible from working for any IMPACT Signatory Contractor for a minimum of 90 days. To be eligible to return to work, the participant must be evaluated by a substance abuse professional, provide written proof of successfully completing a medically recognized rehabilitation program and submit a negative return to duty drug screen. The participant will be subject to a minimum of four (4) accelerated random tests for a period of one year as a condition of further employment. Frequency of the accelerated random testing is to be determined by the SAP.

Third Violation - The individual will be ineligible from working for any IMPACT Signatory Contractor for a minimum of one year. To be eligible to return to work, the participant must be evaluated by a substance abuse professional, provide written proof of successfully completing a medically recognized rehabilitation program and submit a negative return to duty drug screen. The participant will be subject to a minimum of four (4) accelerated random tests for a period of one year as a condition of further employment. Frequency of the accelerated random testing is to be determined by the SAP.*

** In the event that treatment exceeds the suspension period a donor may (on a case by case basis) be approved by their SAP to return to work while continuing specified treatment and continuing to submit negative drug screens.*

For any occurrence greater than a third occurrence, there is an additional 1-year suspension per violation in addition to sanctions listed above.

The participant's violation status will revert back to first violation following 36 consecutive months with a negative drug screen, providing the employee is continually participating in the program.

Any sale and or distribution of a prohibited substance on company or job site premises or property is grounds for immediate termination.

12. Voluntary Rehabilitation

The Signatory Parties of IMPACT encourage participants with substance abuse problems to come forward and voluntarily accept assistance. The participant will be subject to the rehabilitation requirements of the program; however, it will not be considered a violation of the program requirements.

13. Confidentiality

All records and information on employees with confirmed positive test results shall be confidential and released only to designated representatives of the program.

14. Revisions or Amendments

The IMPACT Revised Drug and Alcohol policy and procedures is a living document. The IMPACT Trustees shall meet periodically to review the program and shall have the authority to make changes in the program to improve and assure that it is up to date with new regulations and current practices.



Revised Substance Abuse Policy Procedure Manual – Part II

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I.M.P.A.C.T. Revised Substance Abuse Program

Procedure Manual

Introduction

Overview

The IMPACT Substance Abuse **Revised** Program is a cooperative program intended to encompass both management and labor. The goal of the IMPACT Substance Abuse Revised Program is to provide a drug-free workforce to our customers.

The program is structured so confidential test results are accessible only to designated parties of the program and all information is centralized, thus improving management capabilities.

The program recognizes an employee test performed within the last 12 months as a valid pre-employment test. Standardized procedures and a shared eligibility pool enable a member's current test to:

- Serve as a valid pre-employment test for one or many contractors
- Satisfy a contractor's requirements for hiring a worker to a jobsite
- Prevent a worker who is not in the eligibility pool from working on drug-free projects until they obtain a proper program test

Any participant, meeting all of the program requirements, are included in the pool and are issued an "IMPACT Drug Free Sticker" as verification that all requirements have been met.

Online Verification

IMPACT has provided a service that will enable all Ironworker Local Unions and Signatory Contractors to verify that an employee has a valid program test at any time, 24 hours a day, 7 days a week, via the Internet. This service is an online verification system that is accessible through the IMPACT website at www.impact-net.org.

The verification system is fire wall and pass code protected. Confidential information is not available online. Only determination of work eligibility can be obtained through pass codes.

Roles of the Parties

Third Party Administrator

Mobile Medical Corporation, is the Third Party Administrator for Local 7's program and is located at 23-90, 23rd. Street, Astoria, New York, 11105. Mobile Medical Corporation's phone number is (718)-777-8358 and fax number is (718)-777-8361. Questions can be directed Ernest Papadopoulos @ epapadopoulos@mobmed.com.

The Third Party Administrator is the primary point of contact for all entities comprising the program. The Third Party Administrator is responsible for all of the following administrative duties:

- Enrolling new locals in the program
- Train participating parties on program requirements
- Receiving and maintaining test results
- Distributing "IMPACT Drug Free Stickers" to qualified participants
- Notifying Designated Party Representatives of participants test results
- Administering the random program in conjunction with the DR

- Compiling comprehensive program reports for party representatives and owners
- Help members through the disciplinary procedures

The other entities that comprise the IMPACT program either perform testing, (testing entities) or utilize the information generated (administrative entities).

B. Participating Entities

All participating entities involved in a Substance Abuse Program are vital to the goal of a "Drug Free" work force.

Contractor – Entity required to comply with testing and verify that participants hired have a current “Drug Free Certification.”

- Hires "Drug Free" workers
- Enforces program requirements
- Promotes program to customers

Designated Representative “DR”– Contact within company that works directly with MMC. Receives results

- Enforces drug free program requirements
- Receives confidential information
 - Selected random digit
 - Member eligibility information

Labor Organization – Entity staffing projects with participants eligible to perform work on projects requiring substance abuse testing. Responsible for developing and communicating program to participants.

- Promotes program to membership
- Provides locations for testing
- Promotes program to users and customer

Owner – Entity requiring substance abuse testing on projects.

- Requires substance abuse testing on projects
- Enforces contractor compliance to program

Participant – Entity who tests in the program and complies with testing requirements.

- Reports for testing when selected
- Remains “Drug Free”

Employee Assistance Program (EAP) – Evaluates participant and prescribes rehabilitation program.

C. Testing Entities

Collection Site – An approved location where participants can provide specimen for testing.

- Collects specimens following HHS guidelines
- Ships specimens to SAMHSA certified laboratory

Laboratory – A licensed, accredited facility that analyzes participant specimens.

- Analyzes specimens
- Provides results within 24-72 hours
- Uploads results to TPA and MRO

Medical Review Officer (MRO) – Licensed physician responsible to receive, verify and notify Third Party Administrator (TPA) of participants lab positive test results.

- Interviews participants having positive tests
- Confirms the lab positives

- Reports final results to TPA

Enrollment

A. Registration

IMPACT Approval

As a part of the registration process IMPACT must approve any local interested in the Revised Program:

- IMPACT must approve the union as a contributing party to IMPACT.
- IMPACT will contact Mobile Medical Corporation with approval.
- Mobile Medical Corporation will assign a Program Coordinator to Local.

Enrollment Process

Once approved by IMPACT the local union will receive a call, from their MMC Program Coordinator, to schedule a kick off meeting.

Initial Meeting: At the initial (kick off) meeting, the Program Coordinator will:

- Review the PILOT PROGRAM policy and requirements
- Review demographic information
- Review active signatory contractors
- Review current testing facility list
- Establish a timeline for training

Party Training: At the second meeting, the Program Coordinator will provide training to the Signatory parties. This training can be in a classroom setting or webinar format and will include:

- Revised Program testing requirements & procedures
- Contractor DR involvement
- Rehabilitation procedures
- Sample of all forms and letters used in program
- Assignment of pass codes for the online verification system

Revised Program Testing Procedures

The revised substance abuse testing program will only test members who are working. If a member is not current when dispatched to a job they will be required to have a Pre-Employment instant urine test. Random testing will be collected on the job-site or at a collection facility on specified dates. Each time a member has a negative test result this becomes their new anniversary date and it is valid for a period of twelve months. With the elimination of the member's mail notifications the revised program will strongly rely on the involvement of the contractors. Each contractor will assign a Designated Representative "DR" that will work in conjunction with Mobile Medical Corporation (MMC) and the members. ** Accelerated random testing for members who completed treatment does not apply. This type of random notification will continue to be sent via US Mail and members must test regardless of their employment status.*

Program Testing

Members will either go to a testing facility or will be tested on the job-site
Contact your DR or MMC Program coordinator to be referred to a collection facility.

Upon arrival at an approved Collection Facility, the participant must present:

1. Drivers license/photo I.D.
2. Authorization Form or E-Chain Confirmation # (provided by MMC)

B. Collection Protocol

Collection protocol for both urinalysis and instant testing follows the guidelines established by the Department of Health and Human Services and the Drug and Alcohol Testing Administration (DATIA).

C. How Members are Notified of Results

Negative results are uploaded to the IMPACT national data base which signatory contractors use to verify member's drug free status. Members are mailed an IMPACT "drug free" sticker within 7 – 10 working days of testing negative.

Negative Results –Instant & Lab Analysis:

Instant Negative – Member will receive a copy of the instant result which he/she can give to employer to gain access to the jobsite. Collection site will forward negative result to MMC who will enter it in member's record and upload it to the IMPACT national data base.

Laboratory Negative – MMC receives negative lab results electronically (accelerated random, reasonable suspicion and/or post accident tests) and will update the participant's "Drug Free" record in the IMPACT national database. The member is sent an IMPACT Drug Free Sticker in 7-10 working days.

Positive Results – Instant & Laboratory Analysis:

Instant Positive – Member will receive a copy of the instant result as well as MMC who will notify the contractor DR and enter into member's record. The specimen will then be sent to a SAMHSA certified lab for confirmation testing.

Laboratory Positive - If a member has a confirmed positive lab result, the participant will first have to interview with the Medical Review Officer (MRO). If the MRO confirms the positive test result, the participant will have to complete the rehabilitation requirements. MMC will enter confirmed result into member's record and they will be ineligible to work until they comply with requirements to re-establish eligibility prior to testing for a new "Drug Free Certification."

D. Medical Review Officer (MRO)

The MRO will telephone a participant who has a positive lab result to discuss why the test may be positive.

Prescription Medication

If the MRO finds the test is positive due to medication prescribed to the participant by a licensed physician, the MRO will report the test as negative to the program coordinator and approve his/her "Drug Free Certification".

Unauthorized Substance

If the MRO finds no medical reason for a test to be positive, the MRO informs the participant that the test will be reported as positive. The MMC program coordinator will then inform the participant and mail them the requirements to reestablish eligibility in the program and will refer the participant to an Employee Assistance Program (EAP).

E. Pre-Employment Testing – Instant Test with Laboratory Confirmation

Contractor DR verifies member's eligibility via IMPACT's online verification system @ www.impact-net.org. If member is current they can go to work. If the member is a "NO MATCH" they are not current and the DR needs to contact MMC @ 718-777-8358. If eligible to test (not in treatment or had a refusal to test) MMC will send authorization to approved testing site where member will take an instant/rapid urine test. If the instant result is negative the member reports to work and presents the employer with a copy of the result. MMC will receive a copy of this test and enter it into the member's record; however it is not uploaded into IMPACT's national database.

The instant test specimen is read as a “non-negative” the specimen sample will be split into an A and a B vial (if quantity is not sufficient for two vials only the A vial, or a single specimen, will be sent) will be sent to a SAMHSA certified laboratory for confirmation testing and the result will be uploaded to IMPACT’s national database.

FALSE POSITIVE (Instant result is positive and the lab result is negative):

Member cannot work if instant result is positive. Once the specimen is sent to the lab and confirmed negative the TPA will notify the member and the contractor’s DR. Member can return to work. Member will be reimbursed both wages and benefits for work hours lost by the false positive.

The contractor reimburses the member directly and invoices IMPACT, Washington, DC, for reimbursement. These steps ensure that the member’s benefits are allocated properly. Member’s instant result is reversed in record and member will be eligible in national database.

F. Random Testing

Participants of the program are subject to random testing. MMC will contact contractors via email when their company has been selected to participate. Random testing occurs regularly every 4 – 6 weeks. The contractor can choose which option best fits their needs either a “job-site random” or a “random collected at a testing facility.”

Option #1 - Job Site

1. Job-sites with ten (10) or more Ironworkers are eligible for job-site testing
2. All Ironworkers can be tested (other crafts also at a pre-negotiated rate)
3. MMC will need the following information
 - Jobsite location / physical address
 - Jobsite employee list
 - Jobsite contact name and number
 - Logistics of jobsite
 - Location available to test members privately
 - Special safety or security requirements
4. Preferred testing time a.m., p.m., lunch
5. At completion of testing the test coordinator will review two lists with contractor DR. The first of **who tested** and the second of **who did not**.
6. Together they will finalize the “did not test” list to be certain that an employee was not sent to another jobsite, had called off or was no longer employed.
7. Any member who refused to test and had no verifiable reason why they did not test will be considered “ineligible” and must complete disciplinary procedures before they can return to work.
8. All testing data will be uploaded to the national database once received from lab or is signed off on by contractor DR.

Option #2 – Collection Facility

1. **Day 1:** MMC contacts contractor DR by email with the selected random digit.
 - a. Any member whose social security number ends in that digit is required to random test
2. **Day 2:** DR must respond to MMC by noon with the names and skill check ID of members who they employ whose social security number ends in the selected random digit.
3. **Day 3:** DR provides members with random notice which has testing sites and MMC’s phone number. Member can take the “random authorization form” or an “E-Chain confirmation code” to any of the testing locations listed along with a valid photo ID. MMC representative can also assist selected member with testing.
4. **Day 4:** The next work day the member shows the DR a copy of their testing chain-of-custody as proof that they tested.
 - a. MMC will verify any non-negative results from the lab and report to contractor DR as well as upload final results to IMPACT database.

- b. Any members who did not test by the deadline, refused to test or were confirmed non-negative will be ineligible to work and must complete disciplinary procedures before they can return to work and they must take a return-to-duty test.

OWNER REQUEST

An owner may request that the participants on a job site be tested. Participants that are on the selected job site will be selected for testing and verified by payroll records. The contractor must submit payroll records for random testing.

G. Post Accident Testing

A participant **may** be tested “Post Accident” if they are a direct or indirect cause of accident or injury to persons or property. It is always first priority to treat a member’s injuries and then get a drug/alcohol test. A valid drug test can be collected up to 30 hours after the accident and up to 8 hours for a breath alcohol test. A member cannot return to work until a negative test result is confirmed. If the result is negative the member will be reimbursed for the lost work hours by the contractor (wages and benefits). The contractor can then process a “post accident reimbursement form” through MMC who will approve the amount of hours and send to IMPACT in Washington, DC, for payment.

There are two ways to have a post accident test collected.

1. **Use MMC approved collection site** – call MMC to inform them where a member is being taken for testing. MMC will send an authorization form or E-Chain to the testing site instructing them on test type and if an alcohol test is required. MMC will flag the result and report it immediately once confirmed and notify DR.
2. **Use an out of network collection site** – if the jobsite where the accident / incident occurred is not near any of MMC’s approved sites take the member to the closest facility. Be sure to contact MMC with the name of the member and where they were going. The contractor will be billed for the test in this case and receive the test result. Forward the result and invoice to MMC. We will enter the result and get you reimbursed up to \$47 for the test.

When using an out of network collection site it is very important to ask for a ten panel urinalysis. A test of lesser panels will not be acceptable. Also, be sure the test is being sent to a SAMHSA certified laboratory. There are only 40+ in the USA. If the specimen is not analyzed at a certified lab it will not be acceptable and there will be no reimbursement.

H. Reasonable Suspicion

A participant may be tested for “Reasonable Suspicion” under certain circumstances. In order to request a reasonable suspicion test, on a member, the contractor’s supervisor must have attended **IMPACT’s Reasonable Suspicion Training** class. This class is available free of charge in classroom and webinar formats. It will train on the signs and symptoms of substance abuse, how to observe and document specific behaviors and lastly how to steps that should be taken when requesting a test.

The contractor must submit the “IMPACT Reasonable Suspicion Form” to MMC within twenty-four hours of the incident. MMC should be informed where and when the member is taking their test so they can flag the test result and report as soon as possible. A member cannot return to work until a “Negative” test result is confirmed.

I. Alcohol Testing

A participant may be asked to submit to an alcohol test if “Reasonable Suspicion” or if “cause” is prevalent which indicates that his health and safety or ability to perform work may be impaired. An alcohol test may also be included with a random test as required by an owner. Alcohol testing is performed according to established federal guidelines.

- Alcohol Tests will be administered using blood, breath, or saliva, and confirmed using an approved breath testing device
- A participant that has the presence of Alcohol in system, less than .04%, will be removed from duty for at least eight (8) hours, or one work shift, whichever is longer
- If a participant test shows levels greater than .04%, his/her test will be treated as a positive test, and he/she will be subject to the defined rehabilitation procedures

J. Rehabilitation Requirements

If a participant tests positive, he/she is no longer considered to be an active participant in the pilot program. The participant can only regain their active status in the program once they have completed the rehabilitation requirements. The member will receive notification from the program coordinator, which will contain instructions and a “Reinstatement Form” to be completed after an evaluation by an EAP.

Step #1: Evaluation by Substance Coordinator

The participant must complete the substance abuse evaluation

Step #2: Rehabilitation Program

The participant must complete the rehabilitation program as prescribed

Step #3: Return-to-Duty Test

The participant must submit a non-negative Return-to-Duty drug screen

Suspension Period

First Violation: The individual will be ineligible from working for any IMPACT signatory contractor for a minimum of 30 days.*

Second Violation: The individual will be ineligible from working for any IMPACT signatory contractor for a minimum of 90 days.*

Third Violation: The individual will be ineligible from working for any IMPACT signatory contractor for a minimum of one year.*

**In the event treatment exceeds the suspension period a donor may (on a case by case basis) be approved by their SAP to return to work while continuing specified treatment and continuing to submit negative drug screens.*

For any occurrence greater than a third occurrence, there is an additional 1-year suspension per violation in addition to sanctions listed above.

The participant’s violation status will revert back to first violation following 36 consecutive months with a negative drug screen, providing the employee is continually participating in the program.

Any sale and or distribution of a prohibited substance on company or job site premises or property is grounds for immediate termination.

K. Accelerated Random Testing

After completing a treatment program the member's EAP / SAP will prescribe a number of additional random tests, four or greater, for a period of one year as a condition of further employment. Accelerated random test notification will be sent via US Mail. The member must test regardless of their work status to stay eligible in the national program. If one accelerated random is missed/refused the member will be considered to have another violation and will need to complete all disciplinary procedures before returning to work.

L. Volunteer Rehabilitation

Any participant with a substance abuse problem can voluntarily accept assistance. The participant will have to comply with rehabilitation requirements, but will not be in violation of the program.

Program Testing Analysis

A. Test Panel

The Revised Substance Abuse Program will be conducted within the established guidelines developed by the U.S. Department of Health and Human Services. The initial screening will be done by immunoassay and require GC/MS confirmation.

The urinalysis test panel includes the following ten (10) categories of drugs and cut-off limits:

Drug Class	Initial Screening Cut-Off Limit	Confirmation Cut-Off Limit
Amphetamines	1000 ng/ml*	500 ng/ml*
Barbiturates	300 ng/ml*	300 ng/ml*
Bzolyecognine	300 ng/ml*	150 ng/ml*
Cannabinoids (THC)	50 ng/ml*	15 ng/ml*
Opiates	300 ng/ml*	2000 ng/ml*
Phencyclidine	25 ng/ml*	25 ng/ml*
Benzodiazepines	300 ng/ml*	300 ng/ml*
Methadone	300 ng/ml*	300 ng/ml*
Propoxyphene	300 ng/ml*	300 ng/ml*
Oxycodon	100 ng/ml	300 ng/ml
Alcohol	0.04% BAC	0.04% BAC
*Cut off limits are established by the United States Department of Health and Human Services in their mandatory guidelines for Federal Workplace Drug Testing Programs.		
** The presence of alcohol equivalent to 0.02% to 0.039% BAC in any participant test regulated by the DOT will result in that individual being removed from duty for at least eight (8) hours or one work shift, whichever is longer.		

The instant test panel includes the following ten (10) categories of drugs and cut-off limits:

(Methamphetamine is listed as a separate panel with the instant test but is included in the testing panel for amphetamines in the urinalysis test panel)

Drug Name:	Abbr:	Cutoff:
Amphetamine	AMP	1000ng/mL
Barbiturates	BAR	300ng/mL
Benzodiazepines	BZO	300ng/mL

Cocaine	COC	300ng/mL
Marijuana	THC	50ng/mL
Methadone	MTD	300ng/mL
Methamphetamine	mAMP	1000ng/mL
Opiates	OPI	2000ng/mL
Oxycodone	OXY	100ng/mL
Phencyclidine	PCP	25ng/mL
Propoxyphene	PPX	300ng/mL

B. Laboratory Analysis

Urine Drug Screen

The urine screen is performed by the enzyme immunoassay technique. All positive results are confirmed by Gas Chromatography/ Mass Spectrometry (GC/MS). They are state-of-the-art chemistry analyzers that are fully automated and designed so every function is computer controlled. The screens are run at the pre-determined cut-off levels established by the IMPACT Program.

C. Dilute Specimens

A dilute specimen with a valid, negative laboratory result shall be treated as a negative program test. A dilute specimen with a MRO confirmed positive laboratory result, shall be treated as a positive program test.

Recollection of a dilute specimen shall be deemed necessary only when Creatinine concentration of the original specimen is equal to or greater than 2mg/dL, but less than or equal to 5mg/dL.

D. Adulterated Specimens

During the analytical process specimens are checked for any chemicals that may have been added to the specimen to mask drugs or interfere with the analytical process. These specimens are adulterated specimens and are considered to be a positive testing. Any positive test will require the participant to comply with rehabilitation requirements.

E. How to Request Specimen Re-Analysis

A participant has the right to dispute their result and have the original split sample independently re-analyzed by a laboratory of their choice. The participant must contact the program coordinator within 72 hours of the MRO finding the specimen positive. The laboratory must meet specifications (SAMHSA approved laboratory) stated in the policy. The participant will be responsible for the cost of the re-analysis (not to exceed \$250.00). ** If a donor did not provide specimen quantities required for a split specimen (45-60ml) the donor will waive their right to have the "B" sample reanalyzed but may use the original "A" sample if quantity is sufficient.*

If the independent reanalysis is "negative", the participant will be reimbursed for the cost of the independent test and any lost wages by IMPACT.

If the independent reanalysis is "positive," the participant will be notified by the MRO, and will be required to comply with the rehabilitation requirements. All expenses related to the reanalysis of the original sample and any lost wages will be forfeited.

Appendix

Annual Test– While employed if a member’s current test is near expiration the DR must provide sufficient time (up to 30 days prior to expiration) for the member to have a urinalysis test collected.

Authorization Form: MMC will issue an “Authorization Form” to members who are selected to take a random drug test at a collection site. This form is taken to the testing facility and instructs the collector on the type, the account, laboratory and TPA.

Breath and Alcohol Content (BAC): Breath alcohol concentration expressed as grams of alcohol per 210 liters of breath.

Chain of Custody: The procedures established by SAMHSA and DOT to track specimen handling and storage from point of collection to final disposition. Stringent chain-of-custody procedures ensure the integrity of each specimen collected.

Confirmed Positive Result: The final result of a specimen, which has been first screen tested, to detect the presence of a substance above the established cut-off limit. It is then confirmed by a more precise quantitative method based on the Gas Chromatography/Mass Spectrometry (GC/MS) technique, which specifically identifies the substance and the amount. Tampering with a specimen will also be considered as a positive test result.

Cut off Limit: The lowest level at which a substance can be detected and reported as positive.

Designated Representative “DR”: The designated representative from an organization who acts as the liaison with the TPA. The DR receives confidential information regarding scheduled random testing and member results. The DR plays a primary role in the effectiveness of the Pilot Program.

Drug Class: The type of drugs included in the test panel.

Drug Free Certification Sticker: The certificate issued to a participant meeting all program requirements.

E-Chain: “Electronic Chain-of-Custody” is a web based paperless system that provides enhanced applicant status information, improved testing window enforcement and test type compliance. E-Chains are sent via the internet to any collection site, in the country, utilizing the E-Chain system.

Gas Chromatography/Mass Spectrometry (GC/MS): A sensitive, specific, and accurate analytical procedure used to confirm a positive result of an initial test. GC/MS is absolute quantitative confirmation when you know the drug you are looking for.

Initial Screening Test: A quick immunoassay test, which proves or disproves the presence of substances in excess of the established cut-off limit. Positive results of an initial screen are considered presumptive until confirmed by GC/MS.

Instant / Rapid Drug Test: Urine drug screen that immediately tests specimen for required illicit and prescription drugs. FDA approved and includes an adulterant screen. Results available in 3-5 minutes.

Medical Review Officer (MRO): A licensed physician (medical doctor or doctor of osteopathy) trained to interpret and evaluate confirmed positive test results.

Negative Test: Test result that qualifies a participant for employment as a “Drug Free” member.

NG/ML: Nanograms per milliliter. The unit of concentration used for quantitative drug test results.

Participants: The members of each party of the program voluntarily taking part in the program.

Parties to Program: Organizations, contractors and owners recognizing, accepting, and contributing to the LMCC program.

Pre-Employment Test: If member does not have a current test in the IMPACT system they must test. The pre-employment test is an instant/rapid test with lab confirmation on all results. Member will receive a copy of the instant test result for entrance to jobsite.

Random Test: An unannounced drug screen that is analyzed at a certified laboratory.

Third Party Administrator (Mobile Medical Corporation): An independent party selected by the parties of the program to coordinate and administer the program. The TPA is responsible for maintaining all test results, up-dating the active/inactive status of all participants and notifying the designated party representative from each party his participants tests results.

Substance Abuse Mental Health Services Administration (SAMHSA): A federal organization which recommends substance abuse testing procedures and which certified substance abuse testing laboratories.

Substance Abuse Professional (SAP): A licensed physician (Medical Doctor or Doctor of Osteopathy), a licensed or certified psychologist, a licensed or certified social worker, or licensed or certified employee assistance professional. Additionally alcohol and drug abuse counselors must be certified by the National Association of Alcoholism and Drug Abuse Counselors (NAADAC) Certification Commission, a national organization that imposes qualification standards for treatment of alcohol and/or drug related disorders. All must have knowledge of and clinical experience in the diagnosis and treatment of substance abuse-related disorders.

Employee Assistance Program (EAP): An EAP in intended to prevent or address substance abuse problems as well as assist employees and their eligible family members with interpersonal conflicts, family problems, workplace crises, eldercare stresses, psychological problem and financial management. The EAP is able to provide voluntary and confidential counseling services.

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