



Great Lakes
Construction
Alliance

An Owner, Labor, Contractor Partnership



SUBSTANCE ABUSE POLICY *GUIDELINES FOR SUPERVISORS*

Always consult your employer for additional *company or owner* guidelines.

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CONFIDENTIALITY

Simply do not discuss any information regarding test events...period.

PROCEDURE RANDOM SCREENING

STEP 1: Foreman will be given a Chain of Custody (COC) form to give to the individual chosen for random screening.

STEP 2: Once notified that one is chosen for a random test, and that random test is to be done outside of work hours, that individual has 48 hours to report to an approved testing location with the COC form. If random is to be done immediately, the individual shall proceed to the collection facility.

PROCEDURE FOR CAUSE SCREENING

STEP 1: Aberrant or unusual behavior of an employee is observed on-duty by either the employee's immediate supervisor, higher ranking employee, or other managerial personnel of the contractor *who has been trained to recognize the symptoms of drug abuse, impairment or intoxication.*

STEP 2: The job superintendent or designated manager must document in writing who is to be tested and why. A sample form is attached.

STEP 3: One copy of said document shall be given to the employee before he/she is required to be tested, and one copy shall immediately be made available for the union steward, if requested by the employee.

STEP 4: After being given a copy of the document, the affected employee shall be allowed enough time to be able to read the entire document.

STEP 5: Give a COC form to individual and take him/her to approved testing facility. Please do not allow individual to drive own vehicle.

PROCEDURE FOR EMPLOYEE WITH CHARGEABLE ACCIDENT (POST-ACCIDENT SCREENING)

STEP 1. The job superintendent or designated manager will document in writing who is to be tested and why.

a.) Chargeable Accident :

- A fatality of anyone involved in the accident;
- Bodily injury requiring off-site medical attention;
- Vehicular damage in apparent excess of \$5,000.00
- Non-Vehicular damage in apparent excess of \$5,000.00
- Damage in apparent excess of \$5,000.00 for the combination of both Vehicular and Non-Vehicular damage.

b.) it will not be required for the employer to order a post-accident test if all of the following apply:

- The injury was not serious even though off-site medical attention was required;
- The nature of the injury is common to the employee's job function;
- There was no violation of the work rules;
- There was no reasonable suspicion indicated by the accident investigation.

c.) *If the project owner has an existing post-accident testing policy that is more stringent, the policy may be implemented by the project owner.*

d.) If it reasonably appears that an employee was injured solely as a result of another employee's action, testing will not be required of the injured.

STEP 2: Please make sure individual has a consent form on file by calling MOST at 1-877-522-6869. If MOST has no signed consent form, individual must read and sign a Drug/Alcohol Screen Consent.

STEP 3: Give the individual a COC once consent form is found to be on file at MOST, or has been signed by employee upon request.

STEP 4: The individual will be accompanied to an approved testing facility. If the individual refuses to go to a testing facility, the supervisor should follow the employer's process, whether it is calling a cab, calling police, or driving the individual home, etc.

SCREENING FOR ALCOHOL

STEP 1: Alcohol detection will be based on a breathalyzer. All breath testing shall be conducted by personnel trained in breath alcohol testing.



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TEST EVENTS

NON-CURRENT RESULT:

- Non-current status will be communicated to the contractor's designated representative (and local union representative when applicable) *by the MRO.*
- Individual will be removed from the project immediately and paid for all hours worked.

CURRENT RESULT:

- Individual's status will be Current under the NW Ohio GLCA Substance Abuse Policy.

REFUSAL TO TEST:

- Any individual who refuses to take a drug test or leaves the test facility before the facility indicates that it is okay to leave will be classified as non-current under the Policy.
- Write down the details of the situation, fill out the COC and call, fax or email this information to your company's safety personnel for further handling.

INABILITY TO TEST AND SIGN FORMS DUE TO INJURY:

- If employee is seriously injured and cannot provide a specimen at the time of the accident, the Medical Review Officer will manage the process going forward.
- Write down the details of the situation and call, fax or email this information to your company's safety personnel for further handling.

FREQUENTLY ASKED QUESTIONS BY SUPERVISORS and FOREMAN

I'm the foreman (supervisor.) Should I fire or layoff an individual who became non-current?

Neither. Call your employer's home office. Dismiss the individual from the jobsite.

Is it possible for an individual to be tested at multiple random testing dates during the year?

Yes due to the random process.

Do I have to worry about HIPAA (Privacy of Information)

Although HIPAA Applies to Health Plans, Healthcare Clearing Houses, Health Care Providers, but NOT substance abuse policies, other privacy issues abound. Therefore do not talk about testing events or results.

I don't have enough Chain of Custody forms. Can I use a copy?

Copies are not valid. Your employer will have sufficient number of COC's on hand.

What if the individual refuses to go to the testing facility? Write down the details of the situation, fill out the COC and call, fax or email this information to your company's home office or safety personnel for further handling. *Note: refusal to test results in "non-current" status. Remind your company's safety personnel to fax the "refusal to test" info to MOST!*

The individual said the testing clinic did not do the testing correctly. Should I let him/her back on the jobsite or send him/her back out for another test?

Neither. Only the MRO can confirm or deny whether the testing protocol was followed.

What if individual can not produce enough sample?

Testing facilities will do what they can to accommodate the individual. Individual should not leave testing facility until the facility say it is okay to do so. Leaving beforehand will result in a non-current status under the Policy.

We let an individual work as a contingent employee on the jobsite while his/her pre-employment results were pending. Results came back non-current. What should I do?

If during pre-employment testing the individual was found to be non-current, he/she can not advance beyond contingent status to hired status, even if he/she had been on the payroll for a few days pending the results of the pre-employment test. Call your employer's home office. Dismiss individual from the jobsite.