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

DRUG AND ALCOHOL SCREENING

PROCEDURE MANUAL



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I.M.P.A.C.T. Substance Abuse Procedure Manual

Introduction

Overview

The IMPACT Substance Abuse Program is a cooperative program intended to encompass both management and labor. The goal of the IMPACT Substance Abuse Program is to provide a “pre-qualified” drug-free workforce to our customers. The program creates a pool of eligible drug-free workers in order to eliminate repetitive testing and provide a safe work environment for all parties.

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 firewall 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

A. Third Party Administrator

Mobile Medical Corporation, the Third Party Administrator for the program, is located at 2413 Lytle Road, Bethel Park, Pennsylvania 15102. Mobile Medical Corporation's phone number is (412) 835-8358 or toll-free (888) 662-8358. Questions can be directed to the contact persons, Kelly Wilhelm or Christine Boehm.

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
- Processing participant requests for test packets
- 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
- Compiling comprehensive program reports for party representatives and owners
- Notifying participants when they are to renew their certification

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 – Entity notified of test results and removal of any participant testing positive from projects with drug testing requirements.

- Receives results
- Enforces disciplinary procedures

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 voluntarily tests in the program and complies with testing requirements.

- Enters program with initial test
- 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 a specimen for testing.

- Collects specimens
- Notifies TPA by faxing information
- Ships specimens to approved laboratory

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

- Analyzes specimens
- Provides results within 48 hours
- Transfers results to TPA

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

- Interviews participants having positive tests
- Confirms the lab positives
- Reports final results to TPA

Enrollment

A. Registration

A local union must first register to be enrolled in the IMPACT Substance Abuse Program. A local union can participate by implementing new programs or by providing existing program data to the national IMPACT program. Registration can be completed online or by telephone.

Online Registration

- Log on to the IMPACT website at www.impact-net.org.
- Select the IMPACT registration form
- Submit the completed form

The program coordinator will begin communication with the contact listed on the registration form.

Telephone Registration

- Contact the program coordinator at Mobile Medical Corporation at 1-888-662-8358.

IMPACT Approval

As a part of the registration process, Mobile Medical Corporation will then submit the registration application to IMPACT for approval:

- IMPACT must approve the union as a contributing party to IMPACT.
- IMPACT will contact Mobile Medical Corporation with approval.
- Mobile Medical Corporation will then send out an enrollment packet.

B. Enrollment Process

Once a local is registered, and approved, they will be set up to begin testing. The local union will receive an enrollment packet and a MMC coordinator will call and schedule the initial meeting.

Initial Meeting: At the initial meeting, the program coordinator will:

- Review the policy and requirements
- Collect demographic information
- Establish a timeline for training and testing

Party Training: At the second meeting, the program coordinator will provide training to the signatory parties. The training will include:

- Testing requirements & procedures
- Rehabilitation procedures
- Assign pass codes for the online verification system

C. Local Unions with Existing Substance Abuse Programs

If the local union already has a program in place, or is a member of an existing Building Trades Program, it may transfer data to the nationwide database. Local unions with existing programs will be reimbursed for their data. The local union will receive an enrollment packet upon approval from IMPACT. A MMC program coordinator will then call to coordinate the data transfer.

Create Data Transfer Module: The Third Party Administrator will provide and assist the signatory parties in creating a Data Transfer Module.

- Receive criteria for data transfer
- Transfer of initial data
- Schedule weekly transfer of data

Participating Entities Training: The Third Party Administrator will provide training to the signatory parties. The training will include:

- Online verifications
- Assign pass codes for the online verification system

Program Testing Procedures

A. How to get an Initial Program Test

Members must have an initial test. Initial testing can be collected in any of the following ways:

- At an approved collection facility (the list can be obtained via the internet)
- Through a group collection date scheduled at your local union hall (check for scheduled dates)

Contact your 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. IMPACT test packet

B. Collection Protocol

Collection protocol for both urinalysis and saliva 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 - the program coordinator will update the participant's "Drug Free Certification" and send an IMPACT Drug Free Sticker in seven (7) to ten (10) working days. During the time a participant's random test is being processed, he/she will be recognized as having an active certification.

Positive Results – If a member has a positive result, the participant will first have to interview with the MRO. If the MRO confirms the positive test result, the participant will have to complete the rehabilitation requirements. If the participant is working on a Drug Free job site, he/she will no longer be eligible to perform work on that site and will be discharged. The participant must 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 test 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. Random Testing

Participants of the program are subject to random testing. The program will test 25% of the total participants per year. If the participant does not report for a random test, or if they refuse the test, they are no longer eligible to participate in the program.

The IMPACT program has three selection pools:

Program Pool

A list of participants generated from the program pool by a computer random selector. Participants selected, will be notified by mail and must report, by the date specified, for random testing.

Job Pool

Job sites may also be selected for random testing. Each participant working on a job site chosen for random testing will be tested. Participants on the selected job site will be verified by payroll records. The contractor must submit payroll records for random testing.

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.

F. 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.

Should a participant require a post accident test, the contractor must contact the TPA and provide the name of the participant to be tested. The TPA will then locate a collection facility to collect the test.

G. Reasonable Suspicion

A participant may be tested by "Reasonable Suspicion" under any of the following circumstances:

- Participant was observed using controlled substance
- Participant has distinct smell of substance

The contractor, or owner, should complete a “Reasonable Suspicion Form” and the participant must be tested with either onsite testing kits or at a capable facility. The IMPACT program coordinator must be notified that participant needs to submit a Reasonable Suspicion Test. All results of reasonable suspicion testing must be forwarded to the IMPACT program coordinator to be entered into the program database.

H. 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 contractors or owners. 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

I. Rehabilitation Requirements

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

Step #1: Health and Welfare Referral

The participant must contact the Health and Welfare Fund to be directed to an EAP

Step #2: Evaluation by Substance Coordinator

The participant must complete the substance abuse evaluation

Step #3: Rehabilitation Program

The participant must complete the rehabilitation program as prescribed

Step #4: Return-to-Duty Test

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

J. 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 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 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	2000 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	300 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.		

B. Laboratory Analysis

Urine Drug Screen

The initial 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.

Saliva Drug Screen

The Initial screen may be done by the use of an approved Saliva Drug Screen if a facility owner or current program requires saliva as the method of choice. The initial screen test 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 is a result of ingesting large amounts of water typically just before urine donation or as a result of physiological conditions. Specimens meeting dilute specifications are not considered valid specimens. A participant with a dilute specimen will have to have a second specimen collected within 72 hours.

After a second dilute specimen, the participant may be required to take another test type (blood, saliva). This will be at the participant's expense unless a valid medical reason is provided.

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 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

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 Party Representative: The designated representative from an organization to notify participants testing positive.

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.

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.

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.

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: Individual trained to recognize and evaluate substance abuse disorders in participants testing positive.

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.

This manual was prepared by Mobile Medical Corporation, December 2004.



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