

DRUG AND ALCOHOL	POLICY	
	Document Number:	AS-HR-PL-4031
	Version Number:	04

1.0 Purpose:

The purpose of this Policy is to comply with all Federal regulations mandated by FTA Drug and Alcohol regulations for the transit industry. These include the Federal Transit Administration (FTA) Drug and Alcohol Testing Regulations (49 CFR, Part 655) and the U.S. Department of Transportation (DOT) standards for collection and testing (49 CFR, Part 40), as amended.

The FTA adopted 49 CFR, Part 655, which mandates drug testing, and breathalyzer alcohol testing, for employees performing safety-sensitive functions. These regulations prohibit performance of safety-sensitive functions when there is a positive test result. The FTA regulations require an annual random testing percentage of safety-sensitive employees for drug testing, and an annual testing percentage of safety-sensitive employees for alcohol testing. The Department of Transportation adopted 49 CFR, Part 40, which sets standards for the collection and testing of specimens and verification of test results.

1.1 The purpose of this Policy further includes:

- To detect, deter, educate about, and prevent abuse of drugs and alcohol;
- To maintain a safe and efficient transportation system;
- To establish a safe, drug-free and alcohol-free workplace, and to maintain a work environment free of drug and alcohol related performance problems, accidents, and injuries;
- To provide assistance towards rehabilitation for any employee who seeks VTA's help in overcoming addiction to, dependence on, or problems with alcohol or drugs.

1.2 Cost of Use/Abuse

The cost of substance misuse/abuse is devastating to society, the workplace, the family, and individuals. Two-thirds of all homicides are committed by people who used drugs or alcohol prior to the crime. Two-thirds of all Americans will be involved in an alcohol-related accident during their lifetimes

The medical costs of illness related to substance misuse/abuse are staggering. Each year, 30,000 people die due to alcohol-caused liver disease. Another 10,000 die due to alcohol induced brain disease or suicide.

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1.2.1 Symptoms of Substance Abuse Problems:

- Tardiness
- Alcohol odor on breath
- Overreaction to real or imagined criticism
- Subject of complaints from clients or co-workers
- Avoidance of associates
- Lowered job efficiency
- Confusion
- Difficulty in concentration
- Accidents on the job
- Absenteeism
- Leaving work early
- Excessive Sick Leave
- Frequent unscheduled short-term absences
- Higher absentee rate compared to other worker

1.2.2 Besides the human costs just described, substance-abusing employees create business costs and legal liabilities for their employers:

- Direct and measurable costs, such as the additional health care benefits claimed by substance abusers.
- Less tangible and difficult to measure costs, such as the negative impact on employee morale or the diminished creativity of substance abusing individuals.
- Potential costs or “liabilities” such as a lawsuit filed by an injured party after an accident caused by the impaired employee.

These costs arise because of the effects of substance abuse in many areas, including:

- | | | |
|----------------------------|------------------------------------|-------------------------|
| -Employee Health | -Intoxication | -Employee Morale |
| -Productivity | -Sensory Alteration | -Fetal Alcohol Syndrome |
| -Decision Making | -Anxiety Reduction | -Dependence |
| -Security | -Toxic Psychosis | -Safety |
| -Neurologic & Liver Damage | -VTA Image and Community Relations | |

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2.0 Scope:

Safety-Sensitive Employees

This Policy applies to all employees in safety-sensitive classifications, and those who promote, demote, or transfer into safety-sensitive classifications, and employees of contractors who perform safety-sensitive functions. Under FTA Drug and Alcohol Testing procedures and regulations, safety-sensitive employees are required to comply with all FTA mandated drug and alcohol regulations as a condition of employment. They are subject to pre-employment/pre-duty drug testing, and both drug and alcohol testing for transfer (change of class to a safety-sensitive position), reasonable suspicion, post-accident, random, return-to-duty, and follow-up testing.

In the case of alcohol testing, “performing a safety-sensitive function” includes any period in which the employee is actually performing, ready to perform, is immediately available to perform, or has just performed a safety-sensitive function. For alcohol testing, this Policy applies to breaks or lunch periods when an employee is scheduled to work, because the regulations prohibit use of alcohol within four hours of work.

Safety-sensitive classifications are defined as classifications of work performing, or ready to perform any duty related to the safe operation of mass transit vehicles. (See Exhibit A-Safety Sensitive Classifications).

Safety sensitive functions include:

1. Operation of a revenue service vehicle, whether or not in revenue service;
2. Operation of a non-revenue service vehicle when required to be operated by a holder of a Commercial driver’s license;
3. Controlling the movement or dispatch of a revenue service vehicle;
4. Maintaining a revenue service vehicle or equipment used in revenue service;
5. Carrying a firearm for security purposes, as required by VTA; and;
6. Supervisors who perform any of the above functions or whose job description includes any of the above functions.

Participation in the substance abuse testing program is a condition of employment for each safety-sensitive employee.

3.0 Responsibilities:

3.1 Management and Supervisory Responsibilities:

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Individually, a Manager or Supervisor must:

- A. Complete 60 minutes of training in alcohol and 60 minutes of training in drug abuse, and be fully conversant with this Policy and related procedures;
- B. Ensure that his or her employees are properly trained in the policies and procedures, and in the dangers of drug and alcohol abuse;
- C. Be knowledgeable about VTA's Employee Assistance Program and VTA's Substance Abuse Program;*
- D. Conduct investigations promptly and properly when he or she suspects that an employee may be impaired or affected by drug or alcohol use;
- E. Initiate investigations promptly and properly when he or she suspects the presence of drugs or alcohol in the workplace or during work time, including lunch or breaks. Steps to initiate an investigation may include arranging for the confiscation of any unauthorized drugs, alcohol, or related paraphernalia in the workplace or on VTA property;*
- F. Follow the reasonable suspicion procedure to determine whether drug or alcohol testing is appropriate and, if so, initiate testing, if the supervisor suspects the employee is impaired or affected by drug or alcohol use;
- G. Remove an employee from the performance of safety-sensitive functions following a verified positive breath alcohol test or drug test;

3.2 Contractors and Vendors:

Any and all contractors and vendors hired to provide services for VTA that are safety-sensitive in nature are required to follow procedures that comply with the collection and testing standards of the Department of Transportation (49 CFR, Parts 40 and 655) "Federal Rules".

3.3 Designated Employer Representative:

Questions regarding this Policy or any other aspect of the Valley Transportation Authority Substance Abuse Control Program should be directed to the office of:

NAME: Juan-Mateo Delgado

TITLE: Human Resource Analyst, Substance Abuse Control Program

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ADDRESS: Santa Clara Valley Transportation Authority
3331 N. First St., Bldg. B
San Jose, CA 95134

PHONE: (408) 952-8957

4.0 Policy:

The Valley Transportation Authority is dedicated to providing transit services that are convenient, safe, efficient, and effective. VTA employees are our most valuable resource. It is VTA policy to:

- 1) Take appropriate action to ensure that employees are not impaired in their ability to perform assigned duties in a safe, productive, and healthy manner;
- 2) Provide a drug and alcohol free environment for all employees and patrons;
- 3) Prohibit the unlawful manufacture, distribution, dispensing, possession, or use of Controlled substances (as defined in the Controlled Substances Act);* and
- 4) Encourage employees to voluntarily seek professional assistance whenever personal problems, including alcohol and drug use, adversely affect their ability to perform their assigned duties.*

All employees are encouraged to make use of the available resources for treatment of alcohol and substance abuse problems. Employees who may be experiencing the pressures and problems of substance abuse and/or related problems are urged to seek help through the Employee Assistance Program (EAP) and/or Substance Abuse Professional (SAP).

VTA's Drug and Alcohol Policy includes several components for prevention and intervention. To promote a drug free workplace and comply with FTA regulations, VTA provides supervisory and employee education, a contract for EAP and SAP services, and a substance abuse professional to work with employees who test positive or who self-refer. Employees may self-refer without any fear of discipline.*

Alcohol and drug abuse are conditions that can be treated. VTA promotes a voluntary rehabilitation program to encourage employees to seek professional assistance through VTA's Employee Assistance Program (EAP) prior to testing positive for drugs or alcohol. Employees seeking assistance should self-identify to their Superintendent, Supervisor, Manager or the Substance Abuse Control Program Manager.

Under such conditions, VTA will assist employees who demonstrate their willingness to

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seek and accept professional help with referrals to the EAP and treatment programs under VTA provided medical plans.*

Questions regarding self-referral may be directed to Juan-Mateo Delgado, Human Resource Analyst, at (408) 952-8957, to the employee's Supervisor, Superintendent, or Manager, or to the employee's union representative.*

5.0 Procedure:

5.1 Prohibited Substances:

5.1.1 Prohibited Illegal Substances

FTA regulations specify that safety-sensitive employees are prohibited from consuming any of the following five substances, at all times. The FTA mandates testing for their presence:

- Marijuana
- Cocaine
- Opiates
Codeine Morphine
- **6-Acetyl Morphine**
- Phencyclidine (PCP)
- Amphetamines (**MDMA**)

5.1.2 Alcohol

"Alcohol" means the intoxicating agent in beverage alcohol, ethyl alcohol, or other low molecular weight alcohol including methyl or isopropyl alcohol. An employee is prohibited from reporting or remaining on duty when his or her ability to perform assigned functions is adversely affected or when his or her breath alcohol concentration is .02 or greater. No employee shall have used alcohol within four hours of reporting for duty.

5.1.3 Legal Drugs

A legally prescribed drug is a drug for which an individual has a prescription or other written approval from a physician for use in the course of medical treatment. The appropriate use of legally prescribed drugs and non-prescription medications is not prohibited. Employees who take medications that impair, or may impair, their ability to perform their job safely are required to advise VTA of this before reporting to work or, if on the job, immediately. The misuse of legal drugs while performing transit business is prohibited.*

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Any employee taking prescription or over-the-counter medications including but not limited to those medications that contain alcohol, and has the potential to adversely affect job performance must report this treatment to his/her immediate supervisor before reporting to perform work. If the medication is taken at work, the employee must immediately notify his/her supervisor. In the event a supervisor is not on-duty or is unavailable, the employee is required to notify the next level of supervision and/or the Substance Abuse Control Program Unit. (It is strongly recommended that employees read all over-the-counter medication labels or other pertinent information accompanying such medication(s) in effort to identify any risks. If the employee is uncertain as to the effect of the medication, they should err on the side of safety and report the treatment to their supervisor).

An employee who is taking prescription and/or over the counter drug(s), that has the potential to adversely affect job performance, must obtain a signed statement from a physician stating that the use of the drug(s) at the prescribed or authorized dosage is consistent with the safe performance of the employee's safety sensitive duties. The signed statement must be presented to the employee's supervisor before performing safety-sensitive duties. If the physician cannot provide an assurance that the employee's job duties can be performed safely while taking Rx/OTC drug(s), the employee will be removed from safety-sensitive functions, placed on sick-leave, and the physician will be asked to determine the duration of the employee's medical disqualification.

5.2 Prohibited Conduct:

Manufacture, trafficking, possession, and use of controlled substances

All VTA employees are subject to the provisions of the federal Drug Free Workplace ACT of 1988 and the California Drug Free Workplace Act of 1990. (See VTA Policy #416).^{*} Under these Acts, all employees are prohibited from using or possessing any illegal drugs or alcohol during work time, including lunch or breaks.^{*}

Employees are prohibited from engaging in the manufacture and distribution of controlled substances. Law enforcement officials will be notified as appropriate, where criminal activity is suspected.^{*} (VTA Policy & Drug Free Workplace Act)

VTA Policy – Drugs & Alcohol

Intoxication, use, and possession of prohibited drugs and alcohol while on duty or while in uniform is prohibited.^{*}

FTA Regulations – Alcohol

No safety-sensitive employee shall use alcohol while on duty or while performing safety-

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sensitive functions. Random alcohol testing is permissible while the employee is performing safety-sensitive functions; just before the employee is to perform safety-sensitive functions; or just after the employee has ceased performing such functions.

If an employee is called back to work, the employee must be given the opportunity to acknowledge the use of alcohol at the time of being called to report to duty, and to indicate whether he or she is able to perform his or her safety-sensitive function. No safety-sensitive employee shall have used alcohol within four hours of reporting for duty or work. The regulations require that a safety-sensitive employee, who acknowledges the use of alcohol but claims to be able to perform safety-sensitive functions, must take an alcohol test.

5.3 Drug/Alcohol History:

Applicants for safety-sensitive positions, including VTA employees who transfer into a safety-sensitive position, must provide written consent to obtain information about their drug/alcohol testing and treatment history from all DOT-regulated employers who have employed the applicant/transferee at any time during a two-year period prior to the date of the application and/or transfer to safety sensitive duties. Additionally, the applicant/transferee shall indicate whether he/she has tested positive, or refused, on any DOT pre-employment drug or alcohol test administered by an employer with whom the applicant/transferee applied for employment but was not hired.

Should the applicant/transferee have tested positive on a DOT drug or alcohol test, the applicant/transferee must provide documentation of successful completion of the return to duty process upon request.

5.4 Categories of Required Tests:

A. Pre-Employment

- New Hires
- Transfers
- Return from Leave/Resumption of Safety Sensitive Duties

B. Reasonable Suspicion

C. Post-Accident

D. Random

E. Return-To-Duty (**mandatory observed collection)

F. Follow-Up (**mandatory observed collection)

See Appendix D for details regarding types of tests and testing procedures.

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5.5 Referral To Substance Abuse Professional:

Substance Abuse Professional (SAP). FTA regulations require that employees with positive drug or alcohol tests must be referred for assessment and evaluation by a Substance Abuse Professional before being allowed to return to work. The regulations require a referral regardless of whether an employee is discharged or given a second chance.

Applicants, who are not already employed by VTA, who test positive on a pre-employment test will be provided with a list of Substance Abuse Professionals from whom they may seek assessment and evaluation. Applicants who refuse to test will also be referred to a SAP.

The Substance Abuse Professional (SAP) must have knowledge of and clinical experience in the diagnosis and treatment of alcohol and controlled substances related disorders. The SAP's role is to evaluate the employee's need for assistance in resolving problems related to alcohol or drug abuse, determine if the employee has complied with recommended treatment or rehabilitation, and to determine a program of follow-up testing.

The SAP will assess the employee and determine if the employee should be referred to a substance abuse assistance program or other rehabilitation program. Under FTA regulations, the employee must comply with the recommendations of the Substance Abuse Professional to be returned to work.

Employees referred to an SAP will receive a copy of the SAP's recommended treatment.

Failure to comply with the substance abuse professional's recommendations may be grounds for discipline up to and including discharge. Discipline will be in accordance with disciplinary guidelines contained in agreements with the collective bargaining units (Exhibit C).*

It is the responsibility of employees to seek assistance from a substance abuse professional before alcohol or drug problems lead to disciplinary action. Enrollment and participation in a substance abuse assistance program will not be used against an employee in a disciplinary proceeding. However, enrollment and participation in the substance abuse assistance program will not exempt an employee from discipline if the employee violates FTA regulations or this Policy. If an employee violates this Policy, his or her subsequent use of a substance abuse professional, employee assistance professional, or substance abuse assistance program will have no bearing on the determination of disciplinary action.*

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An employee who self refers and successfully participates in a drug or alcohol rehabilitation program will be subject to clearance by a Substance Abuse Professional, return-to-duty and follow-up testing.*

5.6 Consequences of Positive Test Result:

An employee with a verified positive test result will be removed from service (if they have not already been removed from service) and referred to the Substance Abuse Professional. The employee must comply with the recommendations of the Substance Abuse Professional, pass a return-to-duty test, and submit to follow-up testing for up to five years. Employees who violate these provisions may be subject to discipline up to and including discharge, depending on the circumstances, in accordance with disciplinary guidelines contained in the applicable agreements with the collective bargaining units (Exhibit C).*

5.6.1 The Authority may take action against an employee who:

1. Tests positive for drugs in an amount which exceeds the standards established by the Department of Transportation and the Substance Abuse and Mental Health Services Administration;
2. Tests positive for alcohol in a breath alcohol concentration of .02 or greater under its own authority;
3. Tests positive for alcohol in breath concentration of .04;
4. Refuses required testing, or refuses to cooperate with testing procedures;
5. Interferes with testing procedures, alters, substitutes, or adulterates a sample for purposes of affecting the validity of a test;
6. Fails to comply with the Substance Abuse Professional or the provisions of a rehabilitation or after care program;
7. Has used or possessed drugs or alcohol during work time, including lunch or breaks, or on VTA property, regardless of whether the employee is found to have alcohol or drugs in his or her system at or above the cut-off levels for a positive test.*

FTA regulations require that the employee comply with the recommendations of the Substance Abuse Professional, including the terms and conditions for rehabilitation and after care.

5.6.2 Appeal Rights

The provisions of federal law under this program and the medical directives or opinions issued by those empowered under the federal law, are not subject to re-

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dress under a negotiated grievance procedure.

Employees have rights to appeal any discipline issued as a result of a positive drug or alcohol test through the grievance and arbitration procedures provided for in their Collective Bargaining Agreement or VTA's Personnel Policies and Procedures.

If an employee who is discharged for violation of this Policy is subsequently reinstated by an arbitrator, he or she may be required to be assessed and cleared by a Substance Abuse Professional to return to work, and must successfully adhere to the terms and conditions of rehabilitation, after care, return to duty and/or follow-up testing as determined by the Substance Abuse Professional, and must have a negative return-to-duty test result. *

6.0 Confidentiality of Records:

Release of Information: VTA will make every effort to ensure confidentiality throughout the testing process and to protect the employee's right to dignity and privacy.

The employee has an unqualified right to review his/her drug and alcohol testing records, and to have access to any pertinent records such as equipment calibration records and records of laboratory certifications. The employee is entitled, upon written request, to review and obtain copies of any records relating to his or her drug and alcohol testing and to provide information to dispute the results. VTA shall promptly provide the records requested by the employee. Access to the employee's records shall not be contingent upon payment for records other than those specifically requested.

All test results are confidential. Records are kept separate and secure from all other employee personnel records and access and release is limited. Release of any information is prohibited without the written consent of the employee, except as required by law or FTA regulations, as follows: the collection site, testing laboratory, MRO, SAP, or designee; pursuant to a lawful court order or other law requiring disclosure; or in connection with a VTA disciplinary, grievance, arbitration, or other legal proceeding arising from a certified positive drug or alcohol test or from VTA's determination that the employee engaged in conduct prohibited under FTA rules, or when requested by a State oversight agency, the Secretary of Transportation or National Transportation Safety Board in a post-accident investigation.

7.0 Definitions:

N/A.

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8.0 **Records Maintained:**

The regulations require that VTA maintain records of its substance abuse program in a secure location with secured access. Records must be maintained as follows:

- Results of negative drug tests and alcohol tests less than .02 – one year
- Records of collection and training – two years
- Records of verified positive drug tests & alcohol tests .02 or greater – five years
- Documentation of Refusals – five years
- Calibration documentation – five years
- Referrals to the SAP and evaluations – five years
- Reports to the FTA – five years
- Records of blind sampling testing - two years

The laboratory maintains all records relating to urine specimen analysis in confidence for at least two years. The laboratory may not disclose such records to anyone other than the employer, the employee, or the decision maker in a lawsuit, grievance, or other proceeding initiated by the employee and arising from a verified positive drug test result.

9.0 **Appendices:**

Exhibit A: Safety Sensitive Classifications

Exhibit B: Drug and Alcohol Contractors

Exhibit C: Agreement Between VTA and 521, ATU and AFSCME Regarding
Implementation of FTA Mandated Drug and Alcohol Testing For Safety Sensitive Employees;

Exhibit D-1: Drug and Alcohol Collection and Testing Procedures – General

Exhibit D-2: Post Accident Testing

Exhibit D-3: Reasonable Suspicion Testing

Exhibit D-4: Pre-Employment Testing

Exhibit D-5: Random Testing Procedures

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Exhibit D-6: Return To Duty and Follow-Up Testing

Exhibit E: Employee Substance Abuse Rehabilitation Loan Fund Highlights

Exhibit F: Drug and Alcohol Testing Procedure Fact Sheets

10.0 Education and Training Requirements:

All supervisory personnel shall receive a minimum of two hours of training on the recognition of drug and alcohol use or misuse (one hour on alcohol, and one hour on drugs). The Authority will provide information regarding VTA's drug and alcohol testing program, which shall include:

- Written notice to every covered employee and labor organization of alcohol and drug policies and procedures;
- Display and distribution of informational material;
- A community service hot line for employee assistance;
- Distribution of the Policy;
- A training program of at least one hour for employees, providing information on the effects and consequences of drug use.

11.0 Summary of Changes:

Direct Observation collections are mandatory for all DOT Return-to-Duty and Follow-Up drug testing effective August 31, 2009. The procedures are detailed in the procedures section of the policy. MDMA, MDA, MDEA (aka Ecstasy) and Heroin were added to the drug testing panel effective October 1, 2010.

Cocaine cutoff levels were lowered from 300 ng/ml to 150 ng/ml for initial tests and 150 ng/ml to 100 ng/ml for confirmatory tests.

Amphetamine cutoff levels were lowered from 1,000 ng/ml to 500 ng/ml for initial tests and 500 ng/ml to 250 ng/ml for confirmatory tests.

Several DOT testing definitions were aligned with those of HHS. The new or modified definitions are "Adulterated specimen," "Confirmatory drug test," "Initial drug test (also known as a Screening drug test)," "Initial specimen validity test," "Invalid drug test," "Positive result," "Reconfirmed," "Rejected for testing," "Split specimen collection." The term "Initial validity test" was removed

This Policy was updated to the new format and replaces Policy 421- Drug and Alcohol Policy for Safety-Sensitive Employees Under FTA Regulations.

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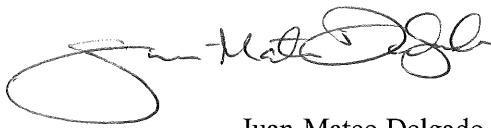


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Policy revision regarding “legally prescribed medications” to address NTSB Safety Recommendations R-01-26.

This policy and program was revised on December 30, 2014.

Date originally adopted by VTA Board of Directors: October 10, 2002

12.0 Approval Information:

<i>Prepared by</i>	<i>Reviewed by</i>	<i>Approved by</i>
 Juan-Mateo Delgado Human Resource Analyst Substance Abuse Control Program	 Bill Lopez Chief Administrative Officer	 Nuria I. Fernandez General Manager/CEO

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