

## **FIRSTLAB OFFERS PHMSA CONTRACTOR/SUB-CONTRACTOR MONITORING**

FirstLab can ensure that your contractors/sub-contractors are in compliance with 49 CFR Part 199 and Part 40 by offering a PHMSA monitoring service. This service includes the following:

### **CONTRACTOR/SUB-CONTRACTOR RECORDS.**

1. Contractor/Sub-Contractors shall retain copies of appropriate drug testing records as required by 49 CFR Part 199 and Part 40.

### **PROCEDURES FOR DETERMINING COMPLIANCE.**

1. Qualifying Potential Contractor/Sub-Contractor(s). Qualifications of the potential contractor as it pertains to drug testing policies/procedures is assured by requesting the potential contractor/sub-contractor to submit the following items to FirstLab for review:
  - a. a copy of its DOT Anti-Drug Plan
  - b. a copy of its Alcohol Misuse Prevention Plan
  - c. a copy of the Federal Custody and Control Form (with laboratory and MRO information)
  - d. a listing of safety-sensitive positions subject to PHMSA regulations
  - e. a semi-annual statistical report showing DOT Drug and Alcohol Testing Activity (Report must be from DHHS certified laboratory, MRO or TPA)

After the review is completed, written correspondence to the contractor/sub-contractor will state whether or not the anti-drug and alcohol misuse prevention plans are acceptable or in need of further additions, deletions, revisions or clarifying language. The review of the contractor/sub-contractor plans shall be completed utilizing the criteria established in 49 CFR Part 199 and Part 40. Addendums made to the contractor's plans will be attached to the previously submitted DOT Anti-Drug and Alcohol Misuse Prevention Program documents. Upon approval of the addendum, a letter of acceptance is then sent to the contractor. The contractor/sub-contractor is then deemed eligible to perform work covered under Part 199.

2. Monitoring Contractor/Sub-Contractor's Compliance. The contractor/sub-contractor will be required to provide information to FirstLab on its DOT-mandated drug and alcohol testing activity. This information may include the name and job title of its employees who will perform any work or functions covered by Part 199 under that contract.

3. Statistical Submission. All contractors will be required to submit quarterly or semi-annual drug and alcohol testing statistical information to FirstLab. The statistical reports must be prepared by the contractor's drug testing laboratory, MRO or TPA. Reports prepared by the contractor will not be accepted.
4. Statistical Record Retention. FirstLab will maintain a complete file on each contractor/sub-contractor's statistical data reports. FirstLab will make these reports available to the pipeline operator upon request.
5. Contractor Compliance Status. Upon completion of the review of each contractor's program, FirstLab contacts the operator and the contractor via email, fax or mail, providing the status of the contractor's compliance. Operator's can access a listing of their contractors via the FirstLab secure web site to check contractor compliance status.
6. Operator Specific Requirements. FirstLab will also monitor contractors' compliance with operator-specified drug and alcohol testing requirements. If, for example, an operator requires contractors to conduct non-DOT pre-employment drug tests using an expanded drug panel or annual drug tests of contractor employees who have not been selected for a DOT drug test during the year, FirstLab can monitor contractors' compliance with those additional testing mandates.

**FOR FURTHER INFORMATION OR QUESTIONS PLEASE CONTACT FIRSTLAB'S BUSINESS DEVELOPMENT DEPARTMENT AT 800-732-3784 OR EMAIL [MKT@FIRSTLAB.COM](mailto:MKT@FIRSTLAB.COM)**