



Boston Government Services, LLC

RANDOM DRUG TESTING EXECUTION AND REPORTING

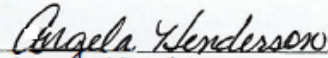
BGS-HR-09

Revision 0

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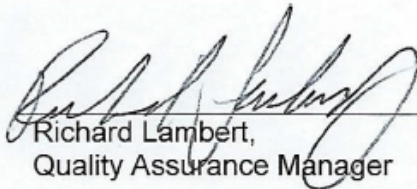


Angela Henderson,
Human Resources Manager

3/28/18

Date Signed

Approved By:

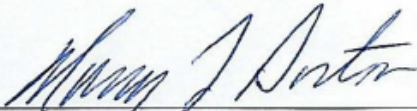


Richard Lambert,
Quality Assurance Manager

3/28/18

Date Approved

Approved By:



Harry Boston,
President

3/28/18

Date Approved

Effective Date:

3/30/2018

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Revision History

Rev. #	Effective Date	By	Type 1	Changes
0	3/30/2018	A. Henderson	N	Initial release.

1 M = major change, mc = minor change, N = new

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1. PURPOSE

The purpose of this procedure is to list the process steps to initiate and complete random drug testing of personnel in Testing Designated Positions (TDPs).

2. SCOPE

This procedure applies to BGS employees and subcontractors (henceforth designated as personnel) in TDPs (i.e., security clearances “Q” or “L”) and who are supporting BGS’s contracts or subcontracts, including those working at client-owned facilities or project sites.

3. REFERENCES

- 3.1 BGS-HR-02, *Workplace Substance Abuse Program*
- 3.2 BGS-HR-03, *Employee Manual*
- 3.3 BGS-HRF-09.1, *Testing Designated Positions Roster*
- 3.4 BGS-QAP-01, *Corporate Quality Assurance Plan*
- 3.5 BGS-RM-01, *Quality Assurance Records*
- 3.6 BGS-RM-02, *Office Records*

4. DISCUSSION AND OVERVIEW

- 4.1. BGS has contractual requirements for a Workplace Substance Abuse Program that calls for BGS to perform random drug testing (RDT) on personnel with security clearances and provide reports to clients as specified (i.e., quarterly, semiannually, or annually).
- 4.2. To conduct any substance abuse testing, BGS uses collection and testing facilities that meet the Department of Health and Human Services (DHHS) guidelines.
- 4.3. Attachment 1 is a flowchart diagram of the random testing process.
- 4.4. Attachment 2 is a flowchart diagram of the RDT reporting process.
- 4.5. Attachment 3 is an example of BGS-HRF-09.1, *Testing Designated Positions Roster*, referred to as the TDP Roster in this procedure.

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5. DEFINITIONS AND ACRONYMS

BGS	Boston Government Services, LLC
DER	Designated Employer Representative
DHHS	Department of Health and Human Services
DOE	U.S. Department of Energy
FSO	Facility Security Officer
HR	Human Resources
QA	Quality Assurance
RDT	Random Drug Testing
TDP	Testing Designated Positions
WSAP	Workplace Substance Abuse Program

6. RESPONSIBILITIES

6.1 Contracts Manager

- 6.1.1 Notifies Workplace Substance Abuse Program (WSAP) Program Manager of any contracts that contain TDPs.
- 6.1.2 Notifies the client immediately if any circumstances raise a drug or security concern, even if it is not clear that the individual has actually used an illegal drug.
- 6.1.3 Transmits WSAP report to client.
- 6.1.4 Submits WSAP report as a record.

6.2 WSAP Program Manager

- 6.2.1 Authorizes drug testing of TDPs at predetermined intervals, and at the request of supervisors.
- 6.2.2 Prepares required WSAP reports for clients in compliance with contractual requirements.
- 6.2.3 Leads investigations and determines path forward on any disciplinary or corrective actions per BGS-HR-02, *Workplace Substance Abuse Program*.

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6.3 Human Resources Manager

- 6.3.1 Initiates the random drug testing process.
- 6.3.2 May serve as the Designated Employer Representative (DER), or Alternate DER.
- 6.3.3 May serve as the WSAP Program Manager.
- 6.3.4 Notifies personnel to report for testing.
- 6.3.5 Notifies WSAP Program Manager, Facility Security Officer (FSO), and BGS management if any circumstance raises a drug or security concern, even if it is not clear that the individual has actually used an illegal drug.
- 6.3.6 Notifies the person's supervisor if the person has been tested and determined to have used an illegal drug.
- 6.3.7 Notifies the person's supervisor if the person fails to report for testing within the required time frame.
- 6.3.8 Maintains in the HR files, record copy of Personally Identifiable Information generated in the performance of this procedure per BGS-RM-02, *Office Records*.

6.4 Designated Employer Representative (DER)

- 6.4.1 Serves as the point-of-contact with the testing agency(ies) and the Medical Review Officer (MRO).
- 6.4.2 Assigns Alternate DERs as needed.
- 6.4.3 Receives the list of randomly selected personnel from the testing agency and provides the list to the HR Manager.
- 6.4.4 Receives and maintains reports from testing agency(ies).
- 6.4.5 Immediately notifies the HR Manager of positive test results and failures to report to the testing agency within the required time frame.
- 6.4.6 Works with the WSAP Program Manager to prepare WSAP reports.

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6.5 Quality Assurance Manager

6.5.1 Reviews and signs WSAP reports.

6.6 Facility Security Officer (FSO)

6.6.1 Ensures the clearance database is updated and maintained, and is accessed only by personnel with a need-to-know.

6.6.2 Reviews and approves the BGS-HRF-09.1, *Testing Designated Position Roster* (TDP Roster; see Attachment 3).

6.7 Supervisor

6.7.1 Upon notification from the HR Manger that a person has not reported for testing within the required time frame, has refused to be tested, or has tested positive, immediately removes person from the work site.

6.8 Personnel

6.8.1 Reports to designated testing facility within two hours of notification. NOTE: Following notification by the HR Manager, failure to report to the testing agency within two hours will be considered the same as a positive test result.

6.8.2 Does not use illegal substances either on or off the job.

6.8.3 Complies with the BGS-HR-02, *Workplace Substance Abuse Program*, BHS-HR-03, *Employee Manual*, and this procedure.

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7. PROCEDURE

7.1 Identifying Testing Designated Positions (TDPs)

- 7.1.1 Contracts Manager reviews contracts for WSAP reporting requirements.
- 7.1.2 IF the contract includes WSAP reporting, THEN the Contracts Manager notifies the WSAP Program Manager and FSO of contract reporting requirements.
- 7.1.3 FSO, or designee, updates and maintains the clearance database.

7.2 Initiating the Random Drug Testing (RDT)

- 7.2.1 On a quarterly basis (i.e., January, April, July, Oct), the HR Manager initiates the RDT process.
- 7.2.2 HR Manager completes the TDP Roster, using the latest information included in the clearance database.
 - a) The TDP Roster must include:
 - (1) Names of BGS personnel that are in active TDPs.
 - (2) Employee Number assigned to personnel listed in the clearance database.
 - (3) The percent of personnel to be tested to meet the annual requirement as identified in specific contracts.
- 7.2.3 HR Manager submits the completed TDP Roster to the FSO for review and signature.
- 7.2.4 FSO reviews, and if acceptable signs and dates the TDP Roster.
- 7.2.5 HR Manager or FSO provides the list to the DER.
- 7.2.6 DER sends the TDP Roster to the testing agency and requests the testing agency produce a list of randomly selected personnel for testing.
 - a) DER files a copy of the TDP Roster and request in HR files.

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7.3 RDT Selection and Notification

- 7.3.1 Testing agency randomly selects personnel from the TDP Roster and transmits selections to the DER. The testing agency should mark this document **Official Use Only** prior to transmitting it to BGS, however if the document is not properly marked, THEN the DER should mark the document Official Use Only upon receipt and handle appropriately.
- 7.3.2 DER provides the HR Manager with the list of randomly selected personnel.
- 7.3.3 HR Manager calls selected personnel and directs them to report to the testing agency within two hours of notification.
 - a) IF personnel on the selection list cannot be reached (i.e., Personal Time Off or travel), THEN the HR Manager may choose an alternate from the list provided by the testing agency or contact the person on the next work day.
 - b) IF an alternate is selected, THEN the HR Manager notifies the testing agency of the substitution.

7.4 Response to Notification

- 7.4.1 Personnel are expected to report to the testing agency within two hours of notification.
- 7.4.2 DER contacts the testing agency at the end of each day that testing is performed to verify that all personnel reported for testing.
- 7.4.3 IF personnel fail to report for testing (in the absence of mitigating circumstances such as illness, travel away from work location, etc.), THEN the DER notifies the HR Manager, FSO, President, and person's supervisor.
 - a) Personnel who fail to report for testing are suspended from work until an investigation and path forward can be determined.
 - b) WSAP Program Manager leads the investigation and path forward on any disciplinary or corrective actions per BGS-HR-02, *Workplace Substance Abuse Program*.

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7.5 Testing Results

- 7.5.1 The testing agency forwards the test results to the DER.
- a) IF results are negative, THEN the DER files results in HR files.
 - b) IF results are positive, THEN the DER notifies the HR Manager, FSO, President, and person's supervisor.
 - (1) Personnel who test positive are suspended from work until an investigation and path forward can be determined.
 - (2) WSAP Program Manager leads the investigation and path forward on any disciplinary or corrective actions per BGS-HR-02, *Workplace Substance Abuse Program Plan*.

7.6 RDT Reporting

- 7.6.1 HR Manager or Contracts Manager receive the clients' WSAP reporting request (e.g., UT-Batelle 2x/yr [July/Jan], DOE 1x/yr [Jan]).
- 7.6.2 HR Manager or Contracts Manager forwards the request to the WSAP Program Manager.
- 7.6.3 WSAP Program Manager generates the WSAP report per client's form/instructions.
- 7.6.4 WSAP Program Manager submits WSAP report to the QA Manager for review.
- 7.6.5 The QA Manager performs an independent check of test results to confirm accuracy of the WSAP report.
- 7.6.6 Upon completion of the QA review, the QA Manager signs the report and returns it to the WSAP Program Manager.
- 7.6.7 The WSAP Program Manager signs the report and forwards to the Contracts Manager.
- 7.6.8 Contracts Manager reviews the report and if acceptable, transmits the report to the client. IF the report is not acceptable, THEN the Contracts Manager sends the report back to the WSAP Program Manager for revision and steps 7.6.3 through 7.6.8 are repeated until the report is acceptable.
- 7.6.9 Contracts Manager submits the WSAP report and transmittal letter to Document Control as a record per BGS-RM-01, *Quality Assurance Records*.

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8. RECORDS

The following records are generated and maintained as records according to BGS-RM-01, *Quality Assurance Records*:

- WSAP reports to the client

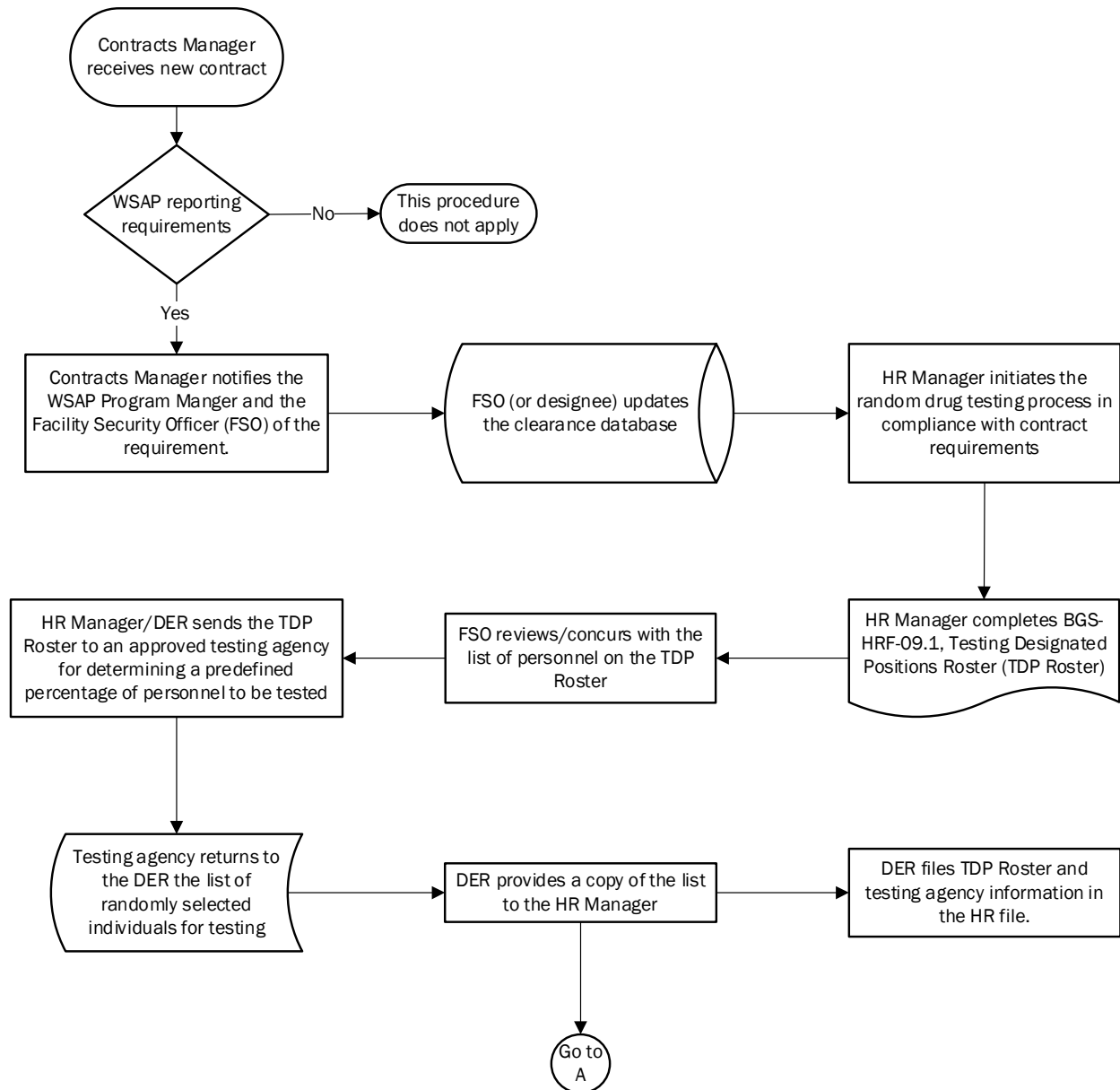
NOTE: Due to HIPPA regulations, all TDP Rosters, results, and records containing Personally Identifiable Information are filed in HR personnel files according to BGS-RM-02, *Office Records*.

9. ATTACHMENTS

- Attachment 1 – Random Drug Test Execution Flowchart
- Attachment 2 – Random Drug Test Reporting Flowchart
- Attachment 3 – Example BGS-HRF-09.1, Testing Designated Positions Roster

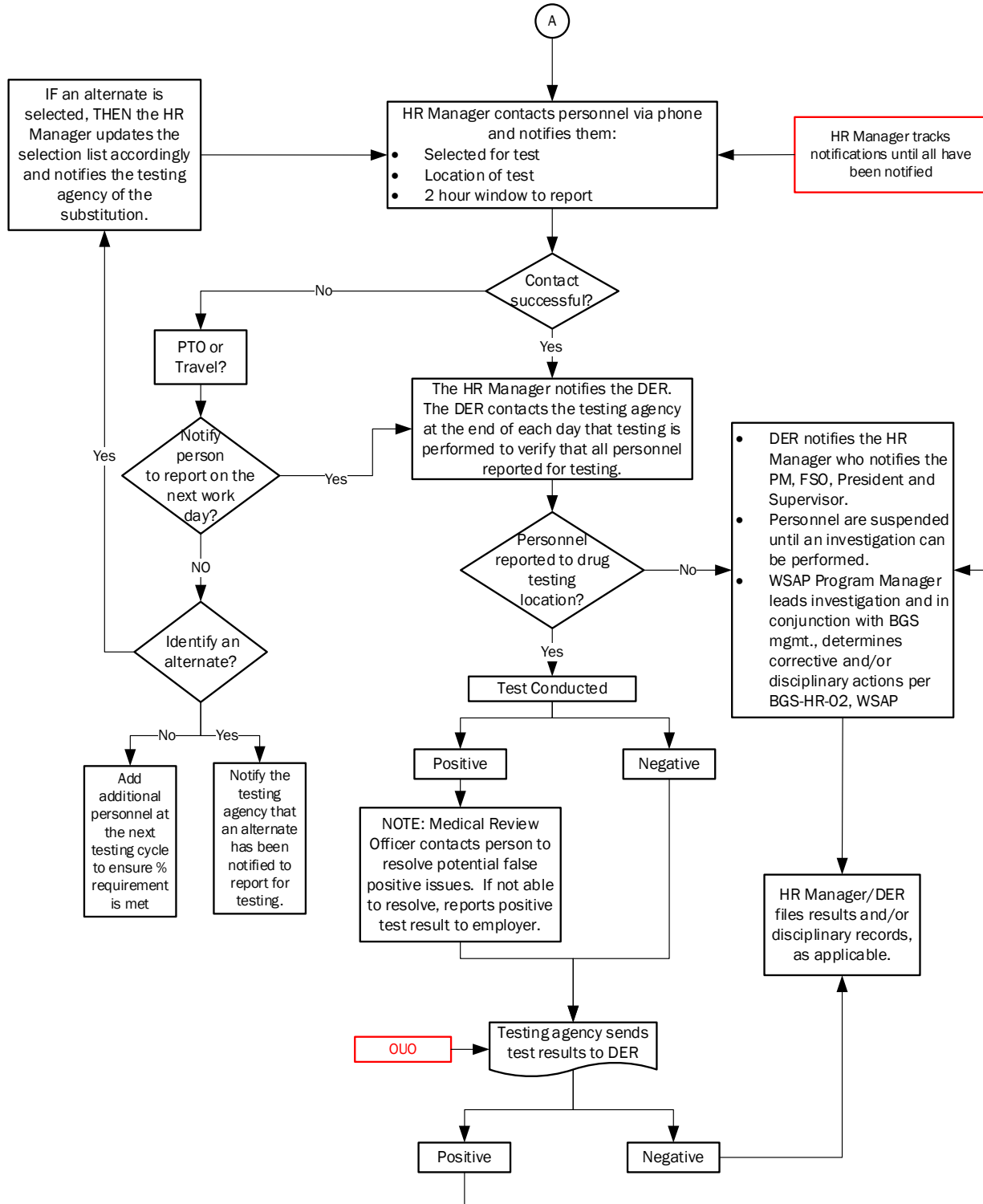
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Attachment 1 – Random Drug Test Execution Flowchart
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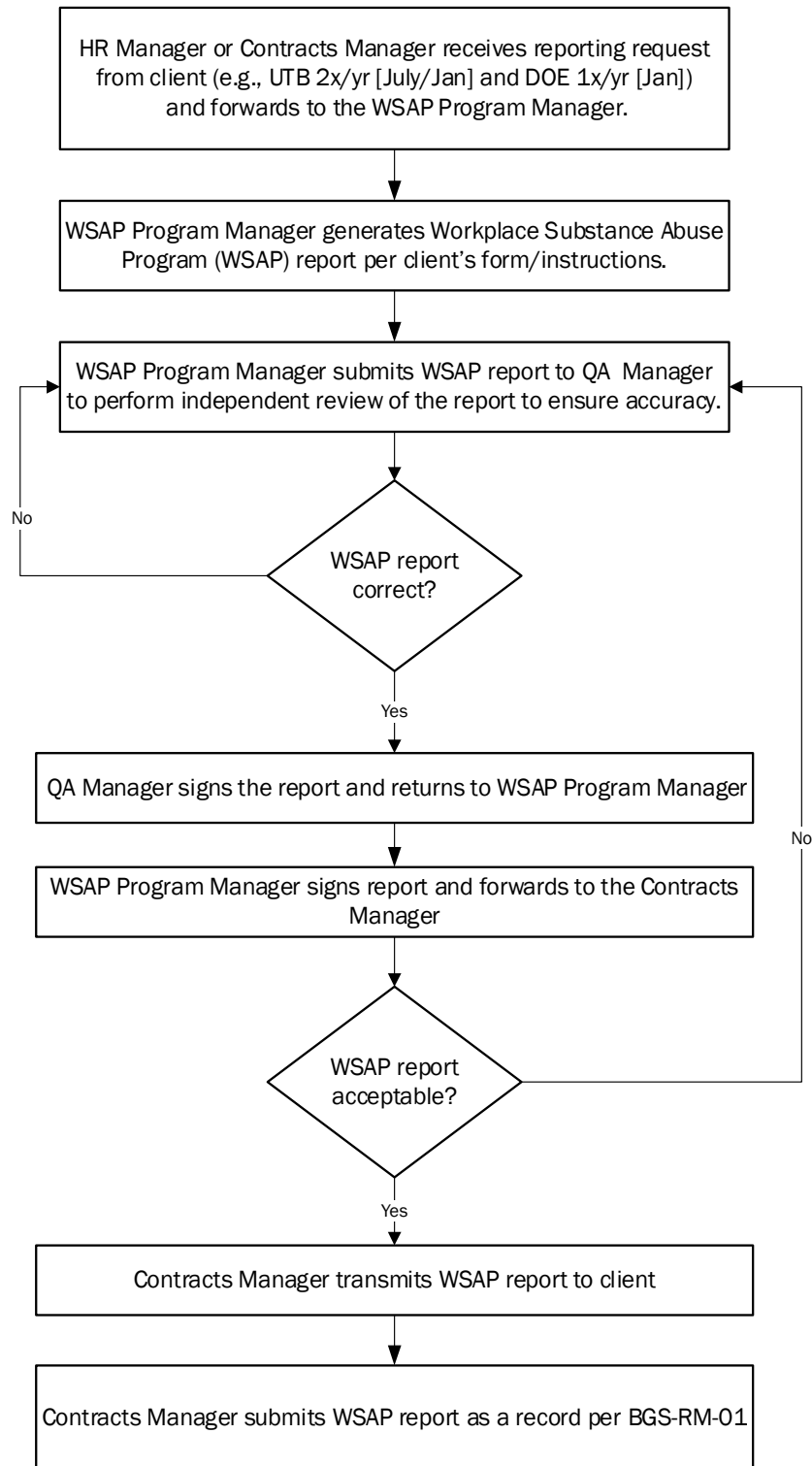
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Attachment 2 – Random Drug Test Reporting Flowchart
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Attachment 3 – Example BGS-HRF-09.1, Testing Designated Positions Roster
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Testing Designated Positions Roster
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Document Date: _____
Percent to be Tested: _____

	Full Name (Last, First, Middle)	Employee Number	Work Location
1.			
2.			
3.			
4.			
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6.			
7.			
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9.			
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41.			
42.			
43.			

Human Resources Manager Name/Signature: _____

Facility Safety Officer Name/Signature: _____

Date: _____

Date: _____

BGS-HRF-09.1, Rev. 0 (03/2018)