

DRUG & ALCOHOL POLICY IMPLEMENTATION ISSUES

RANDOM TESTING

1. How is the random list generated?

Gary Huey (from Joe Boggs and Associates) is responsible for running the lists from a file provided to them by EACC. The file includes names of hourly and salaried employees who are considered "active".

2. How often is a list generated?

We have planned to generate lists monthly for large mines and quarterly for smaller operations, such as Rocklick. HOWEVER, YOU CAN DISCUSS WITH JUDY BAILEY THE FREQUENCY YOU WOULD LIKE TO HAVE YOUR LISTS GENERATED.

3. How often will random testing be conducted?

If lists are generated monthly, testing should be conducted sometime during the month. If lists are generated quarterly, testing should be conducted sometime during the quarter. Scheduling of tests is at the Operations Managers' discretion.

4. What percentage of the workforce will be tested?

10% per year (not 10% of the headcount each month). For example, an operating unit has 300 hourly employees. This means 30 employees will be tested sometime during the year.

5. What happens if the number in the workforce changes substantially mid-year?

10% of the new workforce number will be calculated. This number will be divided by 12 if testing is monthly or by 4 if testing is quarterly. This new number will be used for the remaining months or quarters in the year.

6. Will the 10% apply to hourly and salaried combined?

In order to ensure a proportionate number of hourly and salaried employees are being tested, the 10% calculation will be applied to each group separately.

7. Who is included as an "active" employee when calculating 10% of the workforce?

Employees who are "active" on screen 08, for example:

- Hourly and salaried employees who are actively working;
- Hourly employees who have been absent from work for less than 1 year
- Salaried employees who are on STD benefits (LTD is excluded from headcount)

8. What happens to the pool when employees are hired or retire?

Judy Bailey will notify Joe Boggs & Associates of any changes as they occur.

9. How often can an employee be tested under the random part of the policy?

The policy states that an employee will not be tested more than 2 times in a year under the random section of the policy. However, the employee could possibly be tested more than 2 times in a year when tested under other aspects of the policy (such as RTW after 6 months absence; for cause testing).

10. What if an employee who is on the list to be tested is absent from work due to illness or injury?

The employee's name will be returned to the pool and could be selected again in future months (or quarters).

11. What if an employee who is on the list to be tested is absent on the day the random test is scheduled?

Employee will be tested on another day during the month.

12. Do we schedule our random tests under the EACC/REM/PRCC policy regardless of DOT testing requirements?

Yes. An employee may be tested an unlimited number of times under DOT (if in a DOT covered position). However, the same employee may also be tested up to 2 times under the EACC/REM/PRCC random policy.

13. Will numbers for testing be calculated for each Operating Unit?

Yes. Judy will group operations by operating units. When lists are generated, they will be generated by operating unit/ hourly vs. salaried.

14. Are we using instant tests for random testing?

Yes. This means will have immediate results if test is negative.

15. What happens if the instant test is negative?

The employee will report to work immediately. No further testing is needed.

16. What happens if the instant test is positive?

Employee must not be permitted to work. The urine sample will be sent to a certified lab for additional testing (same as in the past). Please remember, you have complete flexibility in scheduling these tests during the month/quarter.

17. Are quick tests used for other types of drug tests?

Yes. We are already using quick tests for all drug testing (began October 1, 2004).

18. When a breathalyzer is used for an alcohol test, are these results final or is additional testing needed if breathalyzer shows the presence of alcohol?

The type of breathalyzer equipment used by Joe Boggs & Associates is accepted as final. If alcohol is detected through the breath test, the equipment is locked out for several minutes. The test will then be repeated. The results of the second test will then be considered final. No additional testing (i.e. blood test) is needed.

19. Will the Operations Manager be provided with a list of employees who are considered "safety sensitive"?

Yes. The list of salaried job titles is currently being reviewed by legal. Once final, you will receive a copy of the salaried job titles of individuals who will be included in the random testing pool.

All hourly positions are considered safety sensitive.