



**Drug and Alcohol Policy and Procedure for Certain University Marine
Employees #1710.349**

INITIAL EFFECTIVE DATE:	LAST REVISION DATE:	RESPONSIBLE UNIVERSITY DIVISION/DEPARTMENT
August 19, 2019	August 19, 2019	The Division of Human Resources Talent Acquisition and Management

POLICY STATEMENT

The purpose of this policy is to ensure public safety and to maintain a safe, and productive work environment for those individuals who have cause to be on vessel(s) owned and/or operated by those individuals covered by this policy. This policy has been created to try to prevent accidents or other dangerous incidents that may result from drug and/or alcohol use.

This policy applies only to University employees (full-time, part-time, temporary, or seasonal), and volunteers who, as part of their job requirements and as noted in their job description: 1) Operates a vessel in commercial service or is carrying at least (1) passenger for hire as defined by U.S. Coast Guard regulations (e.g., crewmembers as defined by U.S. Coast Guard regulations and those required to have a Coast Guard license), and 2) perform safety-sensitive duties in safety-sensitive positions on a vessel when it is operating as an uninspected passenger vessel regardless of size (collectively covered individuals).

This policy supplements the FIU Boating Safety Manual and the requirements contained in FIU Regulation 2505, Alcoholic Beverages; FIU Policy Alcoholic Beverages and Illegal Drug Possession; and FIU Policy Drug-Free Campus/Workplace Drug and Alcohol Abuse Prevention Policy. All covered individuals are required to read this policy and sign an acknowledgment that they agree to abide by its terms and conditions. See Appendix A. Any conflict between the FIU Boating Safety Manual and this policy is controlled by this policy.

FIU will conduct the following types of tests as described in the procedures: 1) pre-employment, 2) post serious marine incident or post-accident, 3) reasonable cause, and 4) random. Any finalist for employment with a confirmed positive result or who refuses to submit to the test will not be considered. Any employee with a confirmed positive result or who refuses to submit to the test will be subject to discipline as delineated in the procedures below. The procedures also describe the conditions in which FIU may allow an employee to return to work following a confirmed positive result.



The procedures also address the ability for an employee to receive assistance from the University Office of Employee Assistance Program (EAP) or the Substance Abuse Professional (SAP). The procedures address the confidentiality of the test results and required recordkeeping; reporting the results to the Coast Guard; and the governing definitions. Each employee subject to this policy will be required to sign a statement stating that he/she has read, understand, and agrees to abide by the policy.

To accomplish the required testing, reporting to the Coast Guard and other associated duties, the University has contracted with Keys Consortium. Covered employees will be advised if there is any change in this provider.

SCOPE

N/A

REASON FOR POLICY

The purpose of this policy is to ensure public safety and to maintain a safe, and productive work environment for those individuals who have cause to be on vessel(s) owned and/or operated by those individuals covered by this policy. This policy has been created to try to prevent accidents or other dangerous incidents that may result from drug and/or alcohol use. This policy is also created to comply with the Coast Guard regulations.

DEFINITIONS

TERM	DEFINITIONS
Alcohol Use	The consumption of any beverage, mixture or preparation, including any medication, containing alcohol.
Confirmed, Positive Drug Test	The result of a drug test in which a designated Medical Review Officer (MRO) verifies as positive.
Crewmember	An individual who is either: a) On board a vessel acting under the authority of a license or merchant mariner's document issued under the Coast Guard regulations, whether or not the individual is a member of the vessel's crew. b) Engaged or employed on board a vessel owned in the United States that is required by law or regulation to engage, employ, or be operated by an individual holding a license, certificate of

	<p>registry, or merchant mariner's document issued under the Coast Guard (USCG) regulations.</p> <p>c) Exceptions: The following individuals are not subject to a drug and alcohol testing under 46 CFR 16:</p> <ol style="list-style-type: none"> 1. Individuals on fish processing vessels who have no duties that directly affect the safe operation of the vessel; 2. Scientific personnel on an oceanographic research vessel; or 3. Individuals aboard a vessel, not fulfilling a requirement for manning under 464 CFR Part 15 who have no duties that directly affect the safe operation of the vessel.
Drug Test	<p>This is a chemical test of an individual's urine for evidence of the prohibited drug use. FIU will only use the Department of Transportation (DOT) test as required by the Coast Guard (i.e., marijuana, cocaine, opiates (including morphine, codeine, heroin), four (4) semi-synthetic opioids (i.e., hydrocodone, oxycodone, hydromorphone, oxymorphone), and amphetamines (including methamphetamine, amphetamine), phencyclidine (PCP). If the test is for alcohol, FIU will use a breathalyzer or other U.S. Coast Guard approved test (e.g., saliva alcohol testing).</p>
Employee Assistance Program	<p>The EAP is the Employee Assistance Program. The program is a work-based intervention program designed to assist FIU employees in resolving personal problems that may be adversely affects the employee's performance. The program also is an awareness program where FIU employees are made aware of the dangers or illegal drug use.</p>
Medical Review Officer (MRO)	<p>This Is a licensed physician (MD or Doctor of Osteopathy (D.O.)) responsible for receiving laboratory results generated by an employer's drug testing program. The MRO has knowledge of substance abuse and the training to interpret and evaluate an individual's confirmed positive test result together with his or her medical history and any other relevant bio-medical information. The MRO shall be qualified in accordance with 49 CFR Part 40 before performing MRO duties for DOT/USCG regulated companies.</p>
Management Information System (MIS) Report	<p>The Management Information System Report is required to be submitted to Coast Guard every year. The form is an official Department of Transportation (DOT form) and can be submitted to Coast Guard by mail or by submitting the required information by the Internet.</p>

Operation	This means to: (a) navigate, (b) steer, (c) direct, (d) manage, or (e) sail a vessel, or to (f) control, monitor, or maintain the vessel's main or auxiliary equipment or systems, (g) determine the vessel's position, (h) pilot, (i) direct the vessel along a desired track line, (j) keep account of the vessel's progress through the water, (k) order or execute changes in course, rudder position or speed, (l) monitor a lookout, (m) control, operate, monitor, maintain, or test the vessel's (1) propulsion and steering systems, (2) electric power generators, (3) bilge, ballast fire and cargo pumps, (4) deck machinery including winches, windlasses, and lifting equipment, (5) life-saving equipment and appliances, (6) firefighting systems and equipment, (7) navigation and communication equipment, (n) moor, anchor, or handle lines, (o) load or discharge cargo or fuel, (p) assemble or disassemble tows, (q) maintain the vessel's stability and watertight integrity.
Passenger for Hire	Is defined as "a passenger for whom consideration is contributed as a condition of carriage on the vessel, whether directly or indirectly flowing to the owner, charterer, operator, agent, or any other person having interest in the vessel.
Scientific personnel	Scientific personnel on oceanographic research vessels are not considered to be seamen or passengers but are considered as "persons" when requirements are based on total persons on board.
Oceanographic research vessel	The term oceanographic research vessel means a vessel that the USCG finds is being employed only in instruction in oceanography or limnology, or both, or only in oceanographic or limnological research, including those studies about the sea such as seismic, gravity meter, and magnetic exploration and other marine geophysical or geological surveys, atmospheric re-search, and biological research.
Opiates	This is a controlled substance that includes morphine, codeine, heroin and four (4) semi-synthetic opioids (i.e., hydrocodone, oxycodone, hydromorphone, oxymorphone).
Pre-Employment Testing	An applicant for a crewmember or safety-sensitive position must pass a drug test before employment.
Random Testing	Random testing means that the selection of the crewmember to be tested with be done using a scientifically random basis that complies with the requirements of 46 CFR 16.230(c).
Refusal or Refuses to Submit	This happens when a crewmember fails to provide a test sample as required by 49 CFR Part 40 without a genuine inability to

	provide a specimen (as determined by a medical evaluation) after he/she has received notice of the requirement to be tested in accordance with this policy or engages in conduct that clearly obstructs the testing process, such as substitution, intentional dilution, or adulteration of a sample.
Safe-Sensitive Duties	This include but are not limited: a) Directing and mustering passengers in emergencies; b) Passing out lifejackets; c) Controlling and operating lifesaving equipment; and/or d) Controlling and operating firefighting equipment.
Safety-Sensitive Position	Any position (billet) on board a vessel that requires the person filling that position to perform one or more safety-sensitive duties or operation of a vessel on either a routine or emergency only basis. Any person filling a safety-sensitive position is subject to U.S. Coast Guard drug and alcohol testing. All crewmembers that are responsible for the safe handling of passengers are filling safety-sensitive positions as well.
Serious Marine Incident	This is any reportable marine casualty involving a vessel in commercial service and an FIU-owned vessel, which results in any of the following: a) One or more fatalities; b) An injury to a crewmember, passenger, or other person that occurs as a result of the condition or operation of the vessel which requires professional medical treatment beyond first aid, and, in the case of a person employed on board a vessel, which renders the individual unfit to perform routine vessel duties; c) Damage to property, as defined in 46 CFR 4.05-1, in excess of \$10,000; d) The actual or constructive total loss of any vessel subject to Coast Guard Inspection; e) The actual or constructive total loss of any self-propelled vessel; f) A discharge of oil of 10 gallons or more into a navigable waterway; g) A release of a hazardous substance equal to or greater than its reportable quantity into the navigable waters of the United States, or into the environment of the United States, whether or not the release resulted from a marine casualty; h) Any grounding that results in significant environmental damage. Significant environmental damage means any damage that would require reporting to any applicable government



	management agency over which the waters in which the incident occurred.
Substance Abuse Professional	An individual who has met DOT qualifications standards that will do an assessment/evaluation of an employee who has a violation of this policy and will make recommendations concerning education, treatment, follow-up testing, and after-care that will assist these employees covered by this policy.

ROLES AND RESPONSIBILITIES

N/A

RELATED RESOURCES

FIU Boating Safety Manual
FIU Regulation 2505
Alcoholic Beverages; FIU Policy Alcoholic Beverages and Illegal Drug Possession
FIU Policy Drug-Free Campus/Workplace Drug and Alcohol Abuse Prevention Policy
46 CFR 4.06
46 CFR 16
49 CFR 40 Department of Transportation
33 CFR 95

CONTACTS

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PROCEDURE STATEMENT

The procedures address the following topics:

- I. Types of Testing and Associated Requirements
- II. Return to Work
- III. Discipline
- IV. Substance Abuse Professional and the Office of Employee Assistance
- V. Confidentiality of the Results and Recordkeeping
- VI. Reporting the Results to the Coast Guard
- VII. Definitions

I. TYPES OF TESTING AND ASSOCIATED REQUIREMENTS

Drug testing will be conducted in accordance with DOT/USCG rules and regulations and at FIU expense including if the testing is being done for the individual's license renewal. Specifically, covered individuals will be tested for the presence of controlled substances (i.e., marijuana, cocaine, opiates (including morphine, codeine, heroin), four (4) semi-synthetic opioids (i.e., hydrocodone, oxycodone, hydromorphone, oxymorphone), amphetamines (including methamphetamine, amphetamine), phencyclidine (PCP), and alcohol as noted in the procedures) and will be subject to A) pre-employment, B) serious marine accident or post-accident drug testing, C) reasonable cause, and D) random. The Employee and Labor Relations Department (ELR) will be advised as soon as practicable about the need to conduct such testing. All results will be forwarded to the FIU Background Checks Coordinator who will work with ELR and any other HR or supervisory personnel who have a need-to-know.

A. Pre-Employment Testing. Any finalist for, an employee transferring into, and/or an employee assuming additional duties of a position covered by this policy (collectively pre-employment finalists) will be tested for the controlled substances listed in the procedure. No pre-employment finalist will not be tested for alcohol. Prior to conducting the test, the FIU Background Checks Coordinator will require that a pre-employment finalist to read and agree to abide by this policy.

FIU may waive the requirement of the pre-employment drug test if one of the following conditions exist for a pre-employment finalist:

1. Has passed a DOT drug test within the previous six (6) months and has had no confirmed positive tests within those six (6) months.
2. Has been subject to a random drug testing program in accordance with the Coast Guard regulations for at least sixty (60) of the preceding 185 days from the anticipated date of hire, did not have any confirmed positive test results, and did not refuse to take the required test.

It is the responsibility of a pre-employment finalist to advise the FIU Background Checks Coordinator of the potential waiver of the pre-employment drug testing requirement. Before placing a pre-employment finalist in a covered position, the FIU Background Checks Coordinator will request written consent to obtain information required in 49 CFR 40.25 from all of the individual's prior DOT-regulated employers for whom the individual had worked within the previous two (2) years. See Appendix B for a sample Drug and Alcohol Testing Background Consent.

The following information must be requested from DOT-regulated employers who have employed the individual during any period during the two (2) years before the date on the employee application:

1. Alcohol tests with a result of 0.04 or higher (not available from marine employers).
2. Verified positive drug tests.
3. Refusals (including adulterated or substituted samples).
4. Other violations of DOT drug and alcohol testing regulations.
5. If an individual has violated a DOT drug and alcohol regulation, documentation of the individual's successful completion of the DOT return -to-duty requirements.
6. Any other drug and alcohol information from previous employers relating to the person.

If the prior employer does not provide the requested information within thirty (30) days of the request, FIU may consider employing the person in crewmember or safety-sensitive position provided that a pre-employment finalist passes the pre-employment testing as set forth in this policy.

A pre-employment finalist who submits a urine sample cannot be employed until a negative test result is confirmed.

B. Serious Marine Incident or Post-Accident Drug and Alcohol Testing. FIU will test any covered individual whose negligence cannot be discounted as contributing to the serious marine incident. A law enforcement officer has the authority to further name personnel as being directly involved in a serious marine incident and as such, directing them to submit to alcohol and drug testing.

Federal law requires that alcohol testing be conducted within two (2) hours of a serious marine incident once emergent concerns have been addressed. If there are safety concerns to be addressed, alcohol testing can be completed up to eight (8) hours from the serious marine incident. Alcohol testing will be done by saliva, breath, or blood at the drug-testing laboratory (or if it is impracticable to comply with either of the requirements above because of the boat's location, such testing will be accomplished onboard). Required tests will be administered by the Keys Consortium who will also be responsible for maintaining the chain of custody of the specimen unless conditions exist on the vessel that makes it impracticable for the University to comply with the timeframes required by the regulations. The University will have alcohol testing devices onboard in the event that the timeframes cannot be met. Any test conducted onboard will be done by FIU employees trained to correctly use the device and to maintain the appropriate chain of custody. See attached Federal Drug Testing Custody and Control Form (CCF) in Appendix C. Evidence of completion of this training will be included in the FIU employee's personnel file or attached to a volunteer's Person of Interest (POI) record.

Drug testing must be completed within thirty-two (32) hours of a serious marine incident

An FIU employee will be placed on administrative leave pending the outcome of the drug-testing result and/or the conclusion of any investigation into the serious marine incident. If the covered individual is a volunteer, the individual will be told to cease providing volunteer services.

Refusal to submit to a test will be documented and reported to ELR and Coast Guard as appropriate. Refusal to submit to a reasonable cause test subjects the FIU employee to appropriate discipline or removal from services if a volunteer.

FIU will report all tests done to the local Coast Guard Officer in Charge of Marine Inspections on form GC-2692b within at least five (5) days following a serious marine incident. If the drug and alcohol test results are not completed by this time, the results will be turned in immediately upon receiving the results.

C. Reasonable Cause Drug Testing. Any covered individual who is reasonably suspected of using a dangerous drug must be tested. (46 CFR 16.250(a)). Likewise, a

covered individual suspected of being intoxicated or under the influence of alcohol shall be tested.

A covered individual is under the influence of alcohol or a dangerous drug when: a) the covered individual is operating a vessel other than a recreational vessel and has an alcohol concentration of 0.04 percent by weight or more in their blood; or, b) the covered individual is operating any vessel and the effect of the intoxicant(s) consumed by the covered individual on the person's manner, disposition, speech, muscular movement, general appearance or behavior is apparent by observation. (33 CFR 95.020; 95.035)).

Reasonable cause to test a covered individual will be based on a reasonable and articulable belief that the covered individual has used a dangerous drug based on direct observation of specific, contemporaneous physical, behavioral, or performance indicators of probable use. Where practicable, this belief should be based on the observation of the individual by two (2) persons in supervisory positions. (46 CFR 16.250(b)). If there are not two (2) supervisors observing the event or the most senior person on the boat is the subject that needs to be drug tested, the next senior employee will be required to observe the behavior to determine whether the testing should be conducted. All observations, employee discussions, and anything else leading to conclusion that the covered individual should be tested based on reasonable cause will be documented within a reasonable period of time following the observations (e.g., within forty-eight (48) hours of the observation). If a second supervisor/observer also observe the behavior leading to the conclusion, that supervisor will also document the observations. The behaviors will be documented on the Reasonable Cause form attached as Appendix D.

When the FIU supervisor(s)/observer determines that a covered individual must be tested for reasonable cause, the supervisor will inform the covered individual of that fact and direct him/her to provide a specimen to the drug testing laboratory as soon as practicable, following the appropriate chain-of-custody. The supervisor(s) will arrange transportation of the covered individual to the drug-testing laboratory.

An FIU employee will be placed on administrative leave pending the outcome of the drug-testing result. If the covered individual is a volunteer, the individual will be told to cease providing volunteer.

Refusal to submit to a reasonable cause test will be documented and reported to ELR and Coast Guard as appropriate. Refusal to submit to a reasonable cause test subjects the FIU employee to appropriate discipline or removal from services if a volunteer.

D. Random Drug Testing. FIU will conduct random drug testing of a portion of covered individuals position annually. Because FIU belongs to a Coast Guard

compliant consortium, FIU meets its obligations for random testing by pooling our covered individuals with crewmembers from other marine employers who are members of the consortium. The Coast Guard compliant consortium is responsible to test the pool of crewmembers at fifty percent (50%) testing rate annually. The selection of covered individuals for random drug testing shall be made by a scientifically valid method, such as a random number table or a computer-based random number generator that is matched with covered individuals' Social Security numbers, or other comparable identifying numbers. The random testing will be done without prior notice.

Test results or documentation showing the covered employee has been subject to random drug testing shall be provided to that employee or to their designated representative upon written request by the employee.

II. RETURN-TO-DUTY PROCESS

If a FIU employee has confirmed, positive test when there has been a random test, in lieu of taking other appropriate discipline, FIU may allow the FIU employee to continue his/her employment provided that he/she agrees to sign a Last Chance Agreement attached as Appendix E which includes:

- A. Active participation in any drug or alcohol program established by the SAP. All costs of this program will be borne by the employee.
- B. Agreement to share the program requirements and compliance with the requirements with the SAP and the FIU EAP on an ongoing basis.
- C. Agreement to share with his/her supervisor and ELR the dates of compliance with the SAP program, including any periodic visits.
- D. Agreement to undertake periodic follow-up testing as prescribed by the SAP.
- E. Acknowledgment that the FIU employee cannot be returned to his/her position until the MRO provides the SAP, EAP, and ELR with a return-to-work certificate and the FIU employee has fulfilled all of the U.S. Coast Guard requirements included in 49 CFR Part 40, Subpart O.
- F. Acknowledgment that failure to comply with the Last Chance Agreement or if the U.S. Coast Guard suspends or revokes the FIU employee's license, the FIU employee will be terminated for cause and will not be eligible for rehire.
- G. Acknowledgment that the FIU employee will not get an additional Last Chance Agreement if he/she violates this policy again after returning to work under this section.

Only those FIU employees who test confirmed, positive during a random test will be eligible for a Last Chance Agreement. If a FIU employee tests confirmed, positive for any other reasons than a random test (e.g., serious marine incident, reasonable cause) will be subject to appropriate discipline.



This section does not apply to volunteers.

III. DISCIPLINE

FIU employees found in violation of this policy either directly possessing or using alcohol or drugs as described above or through a confirmed, positive drug test will be subject to appropriate discipline. The FIU Background Checks Coordinator will advise the supervisor and ELR as soon as practicable upon being advised of the violation. Such employee will be immediately removed from their safety-sensitive duties, placed on administrative leave, and will be subject to further discipline. Any FIU employee who fails to cooperate with the requirements set forth in this policy, including refusal to test, failure to provide a specimen within a reasonable time, failure to report for a scheduled appointment to provide a specimen,

adulteration of a specimen, will be subject to appropriate discipline action that may include termination of employment. Any FIU employee terminated under this policy will not be eligible for rehire.

Any volunteer who is found to have violated this policy will not be eligible to provide services to FIU in the future.

IV. SUBSTANCE ABUSE PROFESSIONAL AND THE OFFICE OF EMPLOYEE ASSISTANCE PROGRAM

FIU strongly encourages any FIU employee with drug or alcohol abuse to seek treatment. FIU will refer any FIU employee violating this policy to the SAB of any violation of this policy. The current SAP is Nadeen Medvin, Ph.D., 2000 South Dixie Highway, Suite 103, Coconut Grove, Florida 33133 or 1550 Madruga Avenue, Suite 304, Coral Gables, Florida, 33146. The telephone number is (305) 815-1129. FIU will advise its employees via email if another or different SAP is appointed.

FIU has an Employee Assistance Program (EAP) which provides FIU employees with an avenue for getting help should they decide that they have a substance abuse or alcohol abuse problem. The Department of Talent Acquisition and Management (TAM) also provide training to all FIU employees covered by this policy on the dangers of illegal drug use (including misuse of prescription drugs). The training program will include the effects and consequences of drug and alcohol use on personal health safety and the work environment. Part of this program is training supervisors to recognize the signs of illegal drug use. Supervisors will be given at least sixty (60) minutes of training which includes recognizing the signs of illegal drug use. Supervisors will also be specifically trained on how to recognize the physical and behavioral manifestations of substance abuse or alcohol use, how to document reasonable cause conclusions, among other important aspects of this drug testing policy. All employees attending the training will be required to sign-in. TAM will maintain documentation of the training completed by the employees.

The EAP Program will include the display and distribution of information on drug use/abuse, the FIU drug and alcohol policy, and the community substance abuse hot-line telephone for the crewmember's assistance on the EAP website:

oea.fiu.edu/resources/alcoholandotherdrugs. (Section 46 CFR 16.401(a))

V. CONFIDENTIALITY OF DRUG TESTING RECORDS

Information concerning drug and/or alcohol test results or violations of this policy will be treated as confidential information. Such information will be released only to the FIU Background Checks Coordinator and any other management representatives who have a need-to-know. This information will also be provided to the Coast Guard or other federal and state agencies as required by law or regulation.

The FIU Background Checks Coordinator will be responsible for coordinating with the Consortium in the administration of this policy.

In accordance with the Coast Guard regulations and the State of Florida Records Retention Schedules, the FIU Background Checks Coordinator will maintain records relating to this policy as set forth in this section. The FIU Background Checks Coordinator will maintain the following records:

A. Custody and control form, signed by the MRO, indicating the test is either positive or negative, or

B. A lab report (which may have been faxed) that indicates that the test is either positive or negative.

If the FIU Background Checks Coordinator receives a Copy 4 custody and control form that does not bear the MRO's signature, the FIU Background Checks Coordinator will obtain the MRO report or lab report signed by the MRO only (and not its assistant or staff). These two (2) documents will be filed by the FIU designee together to fulfill the Coast Guard requirements. (46 CFR 16.210(b)).

C. Covered employee's signed acknowledgment of the policy for as long as the covered employee is employed by FIU. If the covered employee is terminated for a drug test reason, the signed acknowledgment will be retained for an indefinite period of time.

D. Confirmed, positive or non-negative drug tests for a minimum of five (5) years. This includes positive pre-employment drug tests for any applicant did not hire as a result of the failed test. Negative drug tests must be kept on file and readily available for at least the first year of employment.

E. A list identifying the total number of covered individuals chemically tested annually for dangerous drugs in each of the categories of testing required by the Coast Guard including the annual number of individuals failing chemical tests and the number and types of drugs for which individuals tested positive. The MIS report will satisfy this requirement. 46 CFR 16.260(b)(2)).



F. A copy of the MIS report that is filed by the Consortium every year as required by Coast Guard regulations.

The FIU Background Checks Coordinator will maintain the test records in such a fashion that will permit a covered individual to obtain confirmation that he/she has passed a pre-employment test and has been subject to random testing upon written request.

The FIU Background Checks Coordinator will retain for three (3) years a previous employee's DOT drug and alcohol testing record which includes pre-employment DOT drug and alcohol test results for applicants, even if not hired.

IV. REPORTING THE RESULTS TO THE COAST GUARD

ELR or the Consortium will file a written report with the local or area Officer in Charge of Marine Inspection (OCMI), U.S. Coast Guard, of all confirmed, positive drug test results from any required testing of any individual who has a license, certificate of registry, or merchant marine's document issued by the Coast Guard. ELR or the Consortium designee will report confirmed, positive test results for current and prospective covered individuals (whether hired or not) and whether the position was one where a license, certificate of registry, or merchant marine document is required.

The Consortium will submit to the Commandant (9G-MOA), U.S. Coast Guard by March 1st every year using the Management Information System (MIS) report. The form details the drug testing activity the University has engaged in for the preceding calendar year as required by the Coast Guard regulations.

Alcohol tests will not be reported using the MIS report but will be reported to the Coast Guard at the time of the event.