

**TOWNSHIP OF WEST ORANGE
DRUG AND ALCOHOL POLICY FOR
SAFETY SENSITIVE EMPLOYEES
IN TRANSIT AND TRANSPORTATION**

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I. POLICY STATEMENT

TOWNSHIP OF WEST ORANGE, Board of Directors does hereby endorse the Omnibus Transportation Employee Testing Act of 1991 and the rules mandated by the Department of Transportation (DOT), Federal Transit Administration (FTA) and the Federal Motor Carrier Safety Administration (FMCSA). TOWNSHIP OF WEST ORANGE employees who perform safety sensitive transportation functions, or supervise personnel in safety sensitive transportation functions shall be subject to policies and procedures in accordance with Department of Transportation, 49CFR Part 40 Procedures for Transportation Workplace Drug Testing Programs and 49 CFR Part 655 Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations and 49 CFR Part 382 Controlled Substances and Alcohol Use and Testing for FMCSA safety-sensitive employees.

In an effort to comply with laws, rules and regulations promulgated by Federal Agencies with the authority to do so, as well as to protect affected employees performing work in safety sensitive positions, the Board of Directors for TOWNSHIP OF WEST ORANGE hereby adopts the regulations on December 9, 2014, as set forth in the TOWNSHIP OF WEST ORANGE Drug and Alcohol Policy thereby establishing programs designed to help prevent accidents and injuries resulting from the misuse of alcohol or prohibited drugs used by safety-sensitive employees as defined in 49CFR Part 40 and Part 655 and 382.

II. PURPOSE

By virtue of its daily operations and in pursuit of its quality objectives, TOWNSHIP OF WEST ORANGE recognizes the need to take steps necessary to provide a safe and efficient operating and working environment. Drug and alcohol use adversely impacts our goal of maintaining a safe and efficient operating and working environment, and greatly threatens quality, as abuse adversely affects productivity and impairs judgment. Unimpaired judgment is critical, since decisions affect not only our own business,

but also the safety of our employees, customers, and third parties.

TOWNSHIP OF WEST ORANGE's goal is to encourage employees to come forward with their drug and alcohol problems and seek rehabilitation through the company's Employee Assistance Program ("EAP").

Additionally, separate from any DOT and FTA requirements, under the independent authorization of TOWNSHIP OF WEST ORANGE the employees and agents of TOWNSHIP OF WEST ORANGE are strictly prohibited from engaging in the unlawful manufacture, distribution, dispensation, possession, sale or use of a prohibited drugs in the workplace or while conducting TOWNSHIP OF WEST ORANGE business off the company's premises. Likewise, abuse of legal substances such as alcohol and prescription drugs is also prohibited while at work.

Participation in the prohibited drug and alcohol -testing program is a requirement of each safety-sensitive employee and, therefore, is a condition of employment.

TOWNSHIP OF WEST ORANGE will strictly adhere to all standards of confidentiality and assures all employees that testing records and results will be released only to those authorized by FTA rules to receive such information.

All testing under the FTA requirements are conducted in accordance with 49 CFR Part 40: Procedures For Transportation Workplace Drug and Alcohol Testing Programs.

***A copy of the DOT rule 49CFR Part 40 is located at the TOWNSHIP OF WEST ORANGE Human Resource Department.**

In adopting this policy, TOWNSHIP OF WEST ORANGE does not otherwise waive its right to enforce already established rules, policies, programs, or the terms and provision of any applicable collective bargaining agreement governing drug and alcohol use possession that are consistent with this policy.

Accordingly, TOWNSHIP OF WEST ORANGE has developed the following drug and alcohol policy.

III. ADMINISTRATION RESPONSIBILITIES

To address questions relevant to the anti-drug and alcohol misuse prevention program safety sensitive employees and supervisors shall contact program administrators as follows:

- A. Third Party Administrator ("TPA") on behalf of TOWNSHIP OF WEST ORANGE
- B. TOWNSHIP OF WEST ORANGE Designated Employer Representative ("DER").

Third Party Administrator ("TPA") and TOWNSHIP OF WEST ORANGE DER information is listed on Appendix "A" of this Document.

IV. DEFINITION OF TERMS

The terms listed are consistent with the requirements of 40 CFR Parts 40, 655 382 and have the following meaning:

Accident—FTA an occurrence associated with the operation of a vehicle is as a result:

- 1) An individual dies; or
- 2) An individual suffers bodily injury and immediately receives medical treatment away from the scene of the accident; or
- 3) with respect to an occurrence in which the mass transit vehicle involved is a bus, electric bus, van, or automobile, one or more vehicles (including non-FTA funded vehicles) incurs disabling damage as the result of the occurrence and such vehicle or vehicles are transported away from the scene by a tow truck or other vehicle; or
- 4) With respect to an occurrence in which the mass transit vehicle involved is a rail car, trolley car, trolley bus or vessel, the mass transit vehicle is removed from operation.

Accident for FMCSA safety-sensitive employees includes—Who receives a citation within 8 hours of

occurrence under State or Local law for a moving traffic violation arising from the accident, if the accident involved:

Adulterated Specimen--a specimen that contains a substance that is not expected to be present in human urine, or contains a substance expected to be present but is at a concentration so high that it is not consistent with human urine.

Alcohol--the intoxicating agent in beverage alcohol, ethyl alcohol, or other low molecular weight alcohols including methyl and isopropyl alcohol.

Alcohol Use--the consumption of any beverage, mixture, food or preparation, including any medication containing alcohol.

Alcohol Concentration --expressed in terms of grams of alcohol per 210 liters of breath as measured by an evidential breath testing device.

Breath Alcohol Technician (BAT)--an individual who instructs and assists individuals in the alcohol testing process and operates an Evidential Breath Testing Device (EBT).

Canceled Test--is a drug or alcohol test that has a problem identified that cannot be or has not been corrected, or which this part otherwise requires to be cancelled. A canceled test is neither positive nor negative.

Custody and Control Form --the procedure used to document the handling of the urine specimen from the time the employee gives the specimen to the collector until the specimen is sent to the laboratory for testing thereby destroyed after results have been determined.

Collection Site--a place where safety sensitive employees present themselves for the purpose of providing a urine specimen for a drug test.

Covered Employee--a person, including an applicant or transferee who performs or will perform a safety-sensitive

function for TOWNSHIP OF WEST ORANGE is subject to this policy.

Designated Employer Representative (DER)--an in-house designated employee representative who coordinates the substance abuse process for TOWNSHIP OF WEST ORANGE. The DER's responsibility is to be familiar with all aspects of the TOWNSHIP OF WEST ORANGE substance abuse policy. In addition, the DER is trained regarding policy, and in accordance with the provisions of 49 CFR Part 655.14., and employee authorized by TOWNSHIP OF WEST ORANGE to take immediate action(s) to remove employees from safety-sensitive duties or cause employees to be removed from these covered duties and to make required decisions in the testing and evaluation processes.

Designated employer representative (DER) for FMCSA is an individual identified by the employer as able to receive communications and test results from service agents and who is authorized to take immediate actions to remove employees from safety-sensitive duties and to make required decisions in the testing and evaluation processes. The individual must be an employee of the company. Service agents cannot serve as DERs.

Department of Health and Humans Services (DHHS)--the Department of Health and Human Services or any designee of the Secretary, Department of Health and Human Services.

Department of Transportation (DOT)--Department within the Federal Government that administers regulations requiring drug and alcohol testing which includes the Federal Transit Administration, Federal Railroad Administration, Federal Motor Carrier Safety Administration, Federal Aviation Administration, US Coast Guard, Pipeline and Hazardous Material Safety Administration.

Dilute specimen--a specimen with creatinine and specific gravity values that are lower than expected for human urine.

Employee--an individual who performs a safety sensitive function or holds a safety sensitive position.

Evidential Breath Testing Device (EBT)--an EBT approved by

the National Highway Traffic Safety Administration (NHTSA) for the evidential testing of breath at the .02 and .04 concentrations, and placed on NHTSA's "Conforming Products List" (CPL) of Evidential Breath Measurement."

FTA--Federal Transit Administration, an agency of the U.S. Department of Transportation responsible for the administration of transit related programs and funds.

Medical Review Officer (MRO)--a licensed physician responsible for receiving, interpreting, evaluation and reporting drug-testing results.

Negative Dilute--a drug test result which is negative for the five drug/drug metabolites but has a specific gravity value lower than expected for human urine.

Negative Test--a drug test with a result verified presence of the identified drug or its metabolite below the minimum levels specified in 49 CFR Part 40, as amended. An alcohol test result with a concentration of less than 0.02 BAC is a negative test result.

Non-negative test result--a test result found to be adulterated, substitute, invalid, or positive for drug/drug metabolites.

Positive Drug Test--a drug test result with a verified presence of the identified drug or its metabolite at or above the minimum levels specified in 49 CFR Part 40, as amended. A positive alcohol test result means a confirmed alcohol concentration of 0.04 BAC or greater.

PROHIBITED SUBSTANCES--the consumption of the following drugs and drug metabolites at all times: Marijuana, Cocaine, Opiates, Amphetamines and Phencyclidine (PCP) at levels above the minimum thresholds.

The consumption of any alcoholic substance, beverage, or mixture, including any medication containing alcohol within four (4) hours prior to performing a safety-sensitive duty, while on-call to perform a safety-sensitive duty, while performing a safety sensitive duty or within eight (8) hours following an accident or until the employee undergoes a post-accident alcohol test, whichever occurs first.

Alcohol testing for random and reasonable suspicion is only permissible just before and employee performs safety-sensitive duties, during that performance, and just after an employee has performed covered duties.

Safety Sensitive Function -- means any of the following duties:

- 1) Operating a revenue service vehicle, including when not in revenue service;
- 2) Operating a non-revenue service vehicle, when required to be operated by a holder of a Commercial Driver's License;
- 3) Controlling dispatch or movement of a revenue service vehicle;
- 4) Maintaining (including repairs, overhaul and rebuilding) a revenue service vehicle or equipment used in revenue service;
- 5) Carrying a firearm for security purposes;
- 6) Examples of employees include: Bus Driver, Motorman, Yard Driver, Dispatcher, Starter, Mechanic, and Wheelchair lift repairman, Transit Police Officer, Security Personnel, Wrecker Operator, Snowplow Driver, and Drivers of vehicles carrying over 15 persons.

Safety Sensitive Function--FMCSA means all time from the time a driver begins to work or is required to be in readiness to work until the time he/she is relieved from work and all responsibility for performing work. Safety-sensitive functions shall include:

- (1) All time at an employer or shipper plant, terminal, facility, or other property, or on any public property, waiting to be dispatched, unless the driver has been relieved from duty by the employer;
- (2) All time inspecting equipment as required by §§392.7 and 392.8 of this subchapter or otherwise inspecting, servicing, or conditioning any commercial motor vehicle at any time;
- (3) All time spent at the driving controls of a commercial motor vehicle in operation;

(4) All time, other than driving time, in or upon any commercial motor vehicle except time spent resting in a

sleeper berth (a berth conforming to the requirements of §393.76 of this subchapter);

(5) All time loading or unloading a vehicle, supervising, or assisting in the loading or unloading, attending a vehicle being loaded or unloaded, remaining in readiness to operate the vehicle, or in giving or receiving receipts for shipments loaded or unloaded; and

(6) All time repairing, obtaining assistance, or remaining in attendance upon a disabled vehicle.

Split Specimen Bottle B--a part of the urine specimen that is sent to a first laboratory and retained un-opened, and which is transported to a second laboratory in the event that the employee requests that it be tested following a verified positive test of the primary specimen.

Substance Abuse Professional (SAP)--a licensed physician (medical doctor or doctor of osteopathy) or licensed or certified psychologist, social worker, employee assistance professional, marriage counselor or addiction counselor (certified by the National Association of Alcoholism and Drug Abuse Counselors Certification Commission or by the International Certification Reciprocity Consortium/Alcohol and other Drug Abuse) with knowledge of and clinical experience in the diagnosis and treatment of drug and alcohol related disorders.

Substituted specimen--A specimen with creatinine and specific gravity values that are so diminished that they are not consistent with normal human urine.

Third Party Administrator (TPA)--a "Service Agent" that provides or coordinates the provision of a variety of drug and alcohol testing services to employers. The TPA performs administrative tasks concerning the operation of the drug and alcohol testing program, adheres to generally

accepted standards for administrative services, testing, training, medical review, confidentiality and business

ethics and assures that programs are operated in compliance with DOT/FTA, any state or federal regulations, as well as company policies.

Validity testing--evaluation of the specimen to determine if it is consistent with normal human urine. The purpose of validity testing is to determine whether certain adulterants or foreign substances were added to the urine, if the urine was diluted, or if the specimen was substituted.

Vehicle--means a bus, electric bus, van, automobile, rail car, trolley car, trolley bus, or vessel. A mass transit vehicle is a vehicle used for mass transportation or ancillary services.

Verified Negative Test--a drug test result reviewed by a medical review officer and determined to have no evidence of prohibited drug use above the minimum cutoff levels established by the Department of Health and Human Services (DHHS).

Verified positive test--a drug test result reviewed by a medical review officer and determined to have evidence of prohibited drug use above the minimum cutoff levels.

Volunteer--A volunteer is a covered employee if: (1) The volunteer is required to hold a commercial driver's license to operate the vehicle; or (2) The volunteer performs a safety-sensitive function for an entity subject to this part and receives remuneration in excess of his or her actual expenses incurred while engaged in the volunteer activity

III SCOPE

A. COVERED EMPLOYEES

Covered Employees- This Policy is applicable to all TOWNSHIP OF WEST ORANGE full and part-time safety-sensitive

employees subject to Drug and Alcohol testing under this policy. Additionally, all full and part-time employees of any company or organization who perform safety-sensitive functions on behalf of or under contract with TOWNSHIP OF WEST ORANGE are subject to drug and alcohol testing under this policy. Currently the FTA and FMCSA has defined safety-sensitive job function to mean any of the following duties, when performed by employees of recipients, sub-recipients, operators, or contractors:

- 1) Operating a revenue service vehicle, including when not in revenue service;
- 2) Operating a non-revenue service vehicle, when required to be operated by a holder of a Commercial Driver's License;
- 3) Controlling dispatch or movement of a revenue service vehicle;
- 4) Maintaining (including repairs, overhaul and rebuilding) a revenue service vehicle or equipment used in revenue service.
- 5) Carrying a firearm for security purposes.
- 6) Driver for FMCSA

TOWNSHIP OF WEST ORANGE has reviewed all the actual duties performed by employees to determine who performs safety-sensitive functions, and has determined the below listed job titles as performing safety-sensitive duties:

1. Director
2. Superintendents
3. Supervisors
4. Assistant Supervisors
5. Mechanics
6. Repairers
7. Truck Drivers

Supervisors are subject to the provisions of this policy only if they perform, or have the opportunity to perform a safety-sensitive function.

TOWNSHIP OF WEST ORANGE does not utilize volunteers to provide Safety-Sensitive duties.

B. PROHIBITED DRUGS

Federal requirements provide authorization for testing only five drugs. Procedures used to test for the presence of drugs are in accordance with 49CFR Part 40 and Part 655, which requires testing of urine specimens for five types of drugs or their metabolites; marijuana, cocaine, opiates, phencyclidine, and amphetamines.

Time of Testing While on Duty

Covered employees are subject to testing for five prohibited drugs at anytime while on duty.

C. PRESCRIPTION MEDICATION

Additionally, separate from any DOT and FTA and FMCSA requirements, under the independent authorization of TOWNSHIP OF WEST ORANGE if an employee is using any prescription drug which might impair the employee's ability to perform work, he/she must inform the DER about this possible effect. Before commencing work, the employee must also provide the DER with the name of the prescription and a doctor's authorization to work. All such information provided to TOWNSHIP OF WEST ORANGE will remain confidential.

Consistent with federal law, use of another person's prescription medication shall be considered unauthorized use of medication. It is also considered a violation of this policy if there is clinical evidence that an employee is abusing a legitimately prescribed drug.

In addition, if a drug can only be obtained by prescription in the U.S., it is a violation of this policy for an employee to obtain that drug from a foreign country where no prescription is required and use it while working, unless there is a verifiable, legitimated medical explanation. Failure or refusal by an employee to properly inform the DER or to produce acceptable medical documentation, upon request, may be subject to disciplinary action outlined in Section III, G. of this policy.

D. Right to Inspect

Additionally, separate from any DOT and FTA and FMCSA requirements, under the independent authorization of TOWNSHIP OF WEST ORANGE based upon reasonable suspicion that an employee is violating this policy, TOWNSHIP OF WEST ORANGE has the right to require the employee to submit to a search of clothing, locker, lunch box, bag(s), purse, briefcase, desk, file cabinet(s) and/or vehicle. TOWNSHIP OF WEST ORANGE reserves the right to inspect, investigate, and search for drug and/or legal substances such as alcohol at any time, with or without prior notice, on or in any and all TOWNSHIP OF WEST ORANGE premises.

Employees will be required to sign a consent form prior to the search, if an employee refuses to sign the consent form

and refuses to submit to the search, he/she will be subject to disciplinary action outlined in Section III, G. of this policy.

E. Rehabilitation

Additionally, separate from any DOT and FTA and FMCSA requirements, under the independent authorization of TOWNSHIP OF WEST ORANGE the goal of this policy is to balance our respect for individuals with the need to maintain a safe, productive and alcohol/drug-free environment. The intent of this policy is to offer a helping hand to those who need it, while sending a clear message that the improper consumption of alcohol or illegal use of drugs is incompatible with employment with TOWNSHIP OF WEST ORANGE.

Therefore, if an employee has a problem with alcohol or drugs, he/she is strongly encouraged to come forward voluntarily to seek help. In this event, the matter will be kept confidential, and the employee will be referred to a rehabilitation center. Self identification must be made prior to being directed to take a screening test and may only be used once. However, self identification is NOT an option in the following situations: pre-employment, random, post-accident, reasonable suspicion, return to duty or follow-up testing.

Additionally, separate from any DOT and FTA requirements, under the independent authorization of TOWNSHIP OF WEST ORANGE voluntary rehabilitation will normally only be available once, and only if the employee comes forward before TOWNSHIP OF WEST ORANGE has reasonable suspicion that the employee has violated company policy.

Rehabilitation will be at TOWNSHIP OF WEST ORANGE expense to the extent that it is covered by TOWNSHIP OF WEST ORANGE's policies of insured.

An unpaid leave of absence will be granted for a reasonable period for treatment. TOWNSHIP OF WEST ORANGE will make every effort to hold the employee's position during the rehabilitation process. TOWNSHIP OF WEST ORANGE will not take disciplinary action against an employee who voluntarily admits having an alcohol and/or drug problem unless that employee refuses to enroll in and complete a rehabilitation program. It is a condition of employment for employees to submit to Non-DOT alcohol and/or drug testing as part of a follow-up program for treatment for alcohol and/or drug abuse.

It is crucial to note that the accommodations in this section apply only when an employee voluntarily comes forward. If a alcohol and/or drug abuse problem is disclosed to TOWNSHIP OF WEST ORANGE only after there has been (1) a random alcohol and/or drug selection, (2) a positive alcohol or drug test, (3) a violation of TOWNSHIP OF WEST ORANGE policy, rule or standard, (4) a violation of law, or (5) a violation of this policy, TOWNSHIP OF WEST ORANGE will not consider the employee to have voluntarily come forward.

D. REFUSAL TO SUBMIT TO TESTING FOR ALCOHOL AND/OR DRUG

In accordance with 40 CFR Part 655 the following are considered a refusal to test if the employee:

- 1 1) Fails to appear for any test (excluding pre-employment) within a reasonable time, as determined by the employer, after being directed to do so by the employer;

- 2 2) Fails to remain at the testing site until the testing process is complete;
- 3 3) Fails to provide a urine specimen or adequate amount of breath for any drug or alcohol test required by 49 CFR Part 40 or DOT agency regulations;
- 4 4) In the case of a directly observed or monitored collection in a drug test, fails to permit the
- 5 observation or monitoring of your provision of a specimen;
- 6 5) For an observed collection fails to follow the observer's instructions to raise your clothing above the waist, lower clothing and underpants, and to turn
- 7 around to permit the observer to determine if you have any type of prosthetic or other device that could be use to interfere with the collection process;
- 6) Possessing or wearing a prosthetic or other device that could be used to interfere with the collection process;
- 7) Admitting to the collector or MRO that you adulterated or substituted the specimen;
- 8 8) Fails to provide a sufficient amount of urine or breath when directed, and it has been determined, through a required medical evaluation, that there was no adequate medical explanation for the failure;
- 9 9) Fails or declines to take a second test the employer or collector has directed you to take;
- 10 10) Fails to undergo a medical examination or evaluation, as directed by the MRO as part of the verification process, or as directed by the DER as part of the "Shy Bladder" or "Shy Lung" procedures;
- 11 11) Fails to sign the certification at Step 2 of the Alcohol Test Form;
- 12 12) Fails to cooperate with any part of the testing process (e.g., refuse to empty pockets when so
- 13 directed by the collector, behave in a confrontational way that disrupts the collection process, fails to wash hands after being directed to do so by the collector).
- 14 13) If the MRO reports that you have a verified adulterated or substituted test result that test is considered a refusal to test.

Any covered employee who refuses to submit to a drug or alcohol test will be immediately removed from performing

any safety-sensitive function and in accordance with 49 CFR, Part 40, and Subpart O are referred to TOWNSHIP OF WEST ORANGE's SAP.

E. FAIL A DRUG ABUSE TEST (TEST POSITIVE)

If the confirmation test result shows positive evidence for the presence, under, 49 CFR Part 40 procedures, of a prohibited drug the employee shall be contacted by the MRO.

Any covered employee who fails a drug test will be immediately removed from performing safety-sensitive function and in accordance with 49 CFR, Part 40, and Subpart O are referred to TOWNSHIP OF WEST ORANGE's SAP.

Medical Review Officer (MRO) Responsibility

The designated MRO shall have no connection/conflict with the subcontractor performing the laboratory testing and analysis. The MRO shall be knowledgeable in controlled substance abuse, will have received qualification training in accordance with 49 CFR Part 40.12 and the MRO review process will be followed in accordance with 49 CFR Part 40.

- a. If the MRO reports that an employee tested positive for prohibited drugs, that employee will be immediately removed from safety sensitive functions and in accordance with 49 CFR, Part 40, and Subpart O are referred to TOWNSHIP OF WEST ORANGE's SAP.
- b. If the MRO reports that a negative drug test was dilute TOWNSHIP OF WEST ORANGE's will direct the employee to take another test immediately. Such recollections will not be collected under direct observation, unless there is another basis for use of direct observation.

Referral to a Substance Abuse Professional (SAP) Role

Employees or applicants who have a verified positive drug test result, an alcohol concentration of 0.04 or greater,

or who refuse to submit to a drug or alcohol test will in accordance with 49 CFR, Part 40, and Subpart O be referred to TOWNSHIP OF WEST ORANGE's SAP.

F. PASS (TEST NEGATIVE)/FAIL (TEST POSITIVE) AN ALCOHOL TEST

In the event of a Breath Alcohol (BrAc) concentration result of 0.02 or greater the BAT will direct the employee

to take a confirmation test. The BAT will ensure that the waiting period lasts at least 15 minutes, but not more than 30 minutes after the completion of the first screening test. If the alcohol confirmation test is lower than 0.02, nothing further is required of the employee. If the alcohol confirmation test result is above 0.02 and below 0.04 the employee will be removed from safety-sensitive functions.

If the alcohol confirmation test result is 0.04 or greater it is a positive test. The employee will be immediately removed from safety-sensitive function and will be referred to a SAP.

G. DISCIPLINARY ACTION AS A RESULT OF A POSITIVE TEST

DISCIPLINARY PROCESS

Additionally, separate from any DOT and FTA requirements, under the independent authorization of TOWNSHIP OF WEST ORANGE, if the results of a alcohol and/or prohibited drug screen are positive, the employee will be subject to discipline, up to and including discharge: and/or requested to undergo rehabilitation until such time as he/she is declared fit to return to work by the rehabilitation center. The circumstances leading to the positive result will be taken into consideration in determining the disciplinary action. An employee who refuses to undergo rehabilitation or does not follow the recommendations of the rehabilitation program may be subject to discharge.

If returning to work, the employee will be subject to either DOT or Non-DOT follow-up testing, depending on the circumstance leading to the removal from service.

In the event of a positive alcohol test, regardless of alcohol level or refusal to test, the DER will transport the employee to his/her residence.

ALCOHOL PENALTIES--in accordance with the provisions under TOWNSHIP OF WEST ORANGE's authority as employer the following penalties shall apply:

- (1) Positive Test at 0.040 or Greater. Violations of this policy are subject to disciplinary action up to and including discharge.

Refusal of Alcohol Testing--The penalty for refusing to submit to alcohol testing as required by this policy shall constitute a violation of the policy.

- (2) Violations of this policy are subject to disciplinary action up to and including discharge.

Prohibited Drug PENALTIES-- in accordance with the provisions under TOWNSHIP OF WEST ORANGE's authority as employer the following penalties shall apply:

- 1) Individuals not yet employed--All job applicants extended a conditional offer of employment for a position with TOWNSHIP OF WEST ORANGE will undergo testing for the presence of prohibited drugs as a condition of employment. Any applicant with a confirmed positive test result will be denied employment.
- 2) Individuals employed-- When TOWNSHIP OF WEST ORANGE receives from the MRO a verified positive for drug use test result, the employee shall be immediately removed from safety sensitive functions and referred to TOWNSHIP OF WEST ORANGE's SAP for evaluation. He/she must comply with the SAP's assessment and referred treatment recommendations and monitoring and meet the return-to-duty test requirements of 49 CFR Part 40, Subpart O before the employee may be considered for reinstatement.
- 3) If any employee fails to return to work upon

the prescribed time or refuses to comply with complete treatment, he/she shall be subject to disciplinary action.

4) The penalty for an employee refusing to submit to a prohibited drug test as required by this policy or who

fails to comply with the recommended treatment plan shall be the same as a positive test result.

Additionally, separate from any DOT and FTA and FMCSA requirements, under the independent authorization of TOWNSHIP OF WEST ORANGE, the employee will be informed of resources available for counseling and treatment of persons with drug abuse problems.

If employee is returning to work it is a condition of employment for employees to submit to alcohol and/or drug testing as part of a return-to-duty or follow-up program.

I. PASS A SUBSTANCE ABUSE TEST (TEST NEGATIVE)

If the initial testing or confirmation testing, under 49 CFR Part 40 procedures, does not show evidence of the presence of a prohibited drug in the employee's or applicant's system, it will be classified as passing a drug abuse test or having tests rated as negative.

IV. QUALIFICATIONS FOR EMPLOYMENT AND PROHIBITED CONDUCT

A. PROHIBITED CONDUCT

Periods of Required Compliance

All employees who perform safety-sensitive functions for TOWNSHIP OF WEST ORANGE either in a part time or full time capacity will be subject to the provisions of this policy for the entirety of their shift.

Alcohol Possession/Misuse--The following activities and/or actions are a violation of this policy:

- 1) Additionally, separate from any DOT and FTA requirements, under the independent authorization of TOWNSHIP OF WEST ORANGE, it is

a violation of this policy for any covered employee to possess alcoholic beverages while on duty.

2) Additionally, separate from any DOT and FTA requirements, under the independent authorization of TOWNSHIP OF WEST ORANGE, it is a violation of this policy for any covered employee to work under the influence of alcohol, including rest and meal periods.

3) It is a violation of this policy for any covered employee to test positive for alcohol at or above a Breath Alcohol Level (BRAC) of 0.020L of breath.

4) It is a violation of this policy for any covered employee to consume alcohol for the four (4) hours before a scheduled work period.

5) It is a violation of this policy for any covered employee to consume alcohol for the eight (8) hours after an accident until a Breath Alcohol Test has been administered.

6) It is a violation of this policy for any covered employee to consume alcohol while on call or stand by.

7) It is a violation of this policy for any employee to refuse to take any required alcohol test.

8) Additionally, separate from any DOT and FTA requirements, under the independent authorization of TOWNSHIP OF WEST ORANGE, it is a violation of this policy for any covered employee to refuse to comply with any provision of this policy.

9) Additionally, separate from any DOT and FTA requirements, under the independent authorization of TOWNSHIP OF WEST ORANGE, it is a violation of this policy if alcohol is found in through other legally sanctioned procedures (e.g., police department administered tests).

Prohibited Drug Possession--the following activities and/or actions are a violation of this policy:

1) Additionally, separate from any DOT and FTA requirements, under the independent authorization

of TOWNSHIP OF WEST ORANGE, is a violation of this policy for any covered employee to possess, sell, trade, offer for sale or engage in illegal use of prohibited drugs or product containing an illegal controlled substances. Employees who are convicted of offenses involving prohibited drugs in the workplace must inform the DER within five days of their conviction or plea. Failure to give this notice can be grounds for disciplinary action outlined in Section III, G. of this policy.

- 2) It is a violation of this policy for any covered employee to work under the influence of prohibited drugs.
- 3) Additionally, separate from any DOT and FTA requirements, under the independent authorization of TOWNSHIP OF WEST ORANGE, it is a violation of this policy for any covered employee to use prescription drugs illegally. (However, nothing in this policy precludes the appropriate use of legally prescribed medications in employees name only).
- 4) It is a violation of this policy for any covered employee to test positive for prohibited drugs.
- 5) It is a violation of this policy for any covered employee to refuse to take any required drug test.
- 6) It is a violation of this policy for any covered employee to refuse to comply with any provision of this policy.
- 7) Additionally, separate from DOT and FTA it is a violation of this policy if a drug or metabolite of a drug is found in through other legally sanctioned procedures (e.g., police department administered test).

V. TEST REQUIRED

Testing For Presence of Alcohol

Breath alcohol testing will be conducted in accordance with the regulations specified in 49 CFR Part 40, Subparts J, K,

L, M and N. Alcohol screening will be provided utilizing a National Highway Traffic Safety Association (NHTSA) conforming product list (CPL) Evidential Breath Testing (EBT) Device. The breath testing equipment will conform to 49 CFR § 40.229

TOWNSHIP OF WEST ORANGE will test covered employees for alcohol just before, during, or, just after performing a safety sensitive function.

Use of Alcohol

The consumption of any alcoholic substance, beverage, or mixture, including any medication containing alcohol is prohibited within four (4) hours prior to performing a safety-sensitive duty, while on-call to perform a safety-sensitive duty, while performing a safety sensitive duty or within eight (8) hours following an accident or until the employee undergoes a post-accident alcohol test, whichever occurs first. Alcohol testing for random and reasonable suspicion is only permissible just before and employee performs safety-sensitive duties, during that performance, and just after an employee has performed covered duties.

Life Consequences of Alcohol Misuse

The chronic consumption of alcohol (average of three servings per day of beer, whiskey, or wine) over time may result in the following life consequences;

Health: decreased sexual functioning, dependency on alcohol, fatal liver disease, increased cancers of the mouth, tongue, pharynx, esophagus, rectum, breast, and malignant melanoma, kidney disease, pancreatitis, spontaneous abortion and neonatal mortality, ulcers, and birth defects.

Work: the effects of alcohol misuse on an individual's work include impairment in coordination and judgment, and increased likelihood of having an accident than that of a sober person.

Personal Life: the effects of alcohol misuse on an individual's personal life include increased exposure to

committing homicides, vehicle accidents, family problems including separation and divorce, increased likelihood of committing suicide, and greater exposure to other forms of accidents.

Signs and Symptoms: dulled mental processes, lack of coordination, odor of alcohol on breath, possible constricted pupils, sleepy or stuporous condition, slowed reaction rate, and slurred speech.

When an alcohol problem is suspected, the available methods of intervention include the availability of a crisis response/EAP offered by TOWNSHIP OF WEST ORANGE that addresses family problems as well as substance abuse.

A. EMPLOYEE ASSISTANCE PROGRAM (EAP)

Additionally, separate from any DOT and FTA requirements, under the independent authorization of TOWNSHIP OF WEST ORANGE, any employee may voluntarily make use of the current EAP provided through TOWNSHIP OF WEST ORANGE, for assistance with any personal problems including self-referral for drug and alcohol treatment. This shall be the same program that will be used to assist those affected employees under the alcohol misuse and drug use program. All information will be kept in strict confidence and the appropriate referral will be made to assist the employee.

TOWNSHIP OF WEST ORANGE does not make any representation as to insurance coverage for any treatment or rehabilitation program that may be recommended by the SAP or MRO.

Employees who enter rehabilitation voluntarily will be entitled to use their accumulated vacation-time and sick time balances if they so choose.

TOWNSHIP OF WEST ORANGE's, EAP provider information is listed on Appendix "A" of this Document.

B. PRE-EMPLOYMENT TESTING

TOWNSHIP OF WEST ORANGE will conduct pre-employment drug testing.

In accordance with 49CFR Part 40 each safety sensitive function applicant must consent in writing for TOWNSHIP OF WEST ORANGE to obtain the applicants drug and alcohol testing records from each previous DOT regulated employer of the applicant for a two year period preceding the date of application for employment with TOWNSHIP OF WEST ORANGE. If an applicant or transfer employee fails to consent, that person will not be hired into a safety sensitive function position. Should a previous employer indicate the applicant

or transfer failed or refused a drug and/or alcohol test he/she must provide TOWNSHIP OF WEST ORANGE with proof of having successfully completed a referral, evaluation and treatment plan designed by a SAP.

All applicants for a safety-sensitive position will be notified at the time they complete a job application that they will be required to submit to a prohibited drug test if they are considered otherwise qualified for employment and that they must agree to abide to the terms and conditions of this policy if they are ultimately hire.

1. Prior to the first time that any potential employee performs a safety-sensitive function for TOWNSHIP OF WEST ORANGE, he or she shall be subject to a Pre-employment drug test with a verified negative result.

Additionally, separate from any DOT and FTA requirements, under the independent authorization of TOWNSHIP OF WEST ORANGE, those persons who undergo a pre-employment drug test in which the verified test results indicate positive use shall not be hired.

- 2) Current employees transferring from one position to another with the former not including a safety-sensitive function shall undergo a pre-duty controlled substances test with a verified

negative test result prior to beginning the safety sensitive function. If a positive result is reported he/she shall be subject to Section III G. of the policy.

- 3) All safety sensitive employees who have been off for a period of 90 consecutive calendar days and

removed from the random testing pool must successfully pass a pre-employment drug test prior to returning to work. An applicant, or transferred employee, who has not commenced, performing a safety sensitive function within 90 consecutive calendar days of TOWNSHIP OF WEST ORANGE's receipt of a negative test result for that individual, must successfully pass another pre-employment test before performing such safety sensitive function

C. Post-Accident Controlled Substances Testing

Accident threshold definition located on page 5 of this policy.

- 1) Fatal Accidents--For safety sensitive employees employed by TOWNSHIP OF WEST ORANGE, as defined in Part 655.44 post accident drug and alcohol testing is mandatory following an accident involving the loss of human life on the surviving employees who were operating the mass transit vehicle, as well as any covered employee whose performance may have contributed to the accident, as determined by TOWNSHIP OF WEST ORANGE using the best information available at the time of the decision.
- 2) Non-Fatal Accidents--For safety sensitive employees employed by TOWNSHIP OF WEST ORANGE, as defined in Part 655.44 post accident drug and alcohol testing is mandatory of all covered employees who were operating the mass transit vehicle, as well as any covered employee whose performance may have contributed to the accident, unless the TOWNSHIP OF WEST ORANGE determines their performance can be completely discounted as a contributing factor using the best information available at the time of the decision.

***Post accident testing that does not meet the FTA and FMCSA Post-accident threshold may take place. However, testing under this authority will be performed using a Non-DOT Custody and Custody form.**

- 3) In the event of an accident occurring as described above, the employee shall be required to remain at the scene or readily available to undergo drug and alcohol testing. Drug and alcohol testing shall not delay necessary medical attention for the injured following an accident or prohibit a covered employee from leaving the scene of the accident for the period necessary to obtain assistance in responding to the accident or to obtain necessary emergency medical care.
- 4) Any employee subject to post-accident testing as required by this Section who leaves the scene of an accident before a drug and alcohol test is administered, or fails to remain readily available for testing for up to 32 hours, shall be deemed to have refused to submit to testing. Such a refusal shall be treated by TOWNSHIP OF WEST ORANGE in the same manner as if the employee had a positive drug and alcohol test result.
- 5) All drug and alcohol testing required by this Section shall be performed by TOWNSHIP OF WEST ORANGE's authorized agent within two (2) hours but no more than thirty-two (32) hours after the time of the accident.

Additionally, if an alcohol test is not administered within two (2) hours following an accident TOWNSHIP OF WEST ORANGE shall prepare and maintain on file a record stating why. If an alcohol test is not conducted within eight (8) hours TOWNSHIP OF WEST ORANGE shall prepare and maintain on file a report explaining why a test was not conducted and shall cease attempts to administer an alcohol test. If a drug test is not administered within thirty-two (32) hours following an accident TOWNSHIP OF WEST ORANGE shall prepare and maintain on file a record stating why. The time of the accident shall be determined by the hour utilized on the Police Accident Report.

- 6) Additionally, separate from any DOT and FTA requirements, under the independent authorization

of TOWNSHIP OF WEST ORANGE, while awaiting the results of a post- accident screen the employee will be suspended with pay.

D. Random Controlled Substances Testing

Random drug and/or alcohol testing for covered employees will be conducted in accordance with the requirements of 49 CFR Part 655.45 and 382.305.

- 1) Random drug and/or alcohol testing shall be unannounced and unpredictable and spread reasonably throughout the calendar year, including holidays and days and hours during which safety-sensitive functions are performed.
- 2) Using a statistically valid method, a computer-based random number generator Third Party Administrator (TPA), Care Station, 328 West Street, Georges Avenue, Linden, New Jersey 07035, TOWNSHIP OF WEST ORANGE's program administrator shall assure that a sufficient number of random drug and alcohol tests equal to the minimum percentage of the total number of covered employees is conducted each calendar year in accordance with 49 CFR Part 655.45. Each covered employee shall have an equal chance of being tested each time selections are made. These rates are subject to annual review and revision by the FTA and the FMCSA Administrators. TOWNSHIP OF WEST ORANGE shall be responsible for the security of all random lists generated.
- 3) Safety sensitive employees may be randomly tested for alcohol misuse while performing safety sensitive functions, just before performing safety sensitive functions or, just after performing safety sensitive functions. All safety sensitive employees may be randomly tested for drugs anytime while on duty. Testing will be performed during all hours safety sensitive duties are performed.
- 4) When notified of a random test the employee must

proceed immediately to the collection site. Immediately means that after notification, all the employee's actions must lead to an immediate specimen collection.

E. REASONABLE SUSPICION TESTING

All employees who supervise safety sensitive personnel affected by this policy shall undergo reasonable suspicion training in accordance with Part 655.14 and 382.307 in the signs and symptoms that are associated with drug or alcohol use.

- 1) An employee is required to submit to an alcohol and or drug test when a trained supervisor or other trained company official has reasonable suspicion, based on specific contemporaneous, articulable observations concerning the appearance, behavior, speech or body odors of the employee, to believe that the employee has engaged in any of the behaviors prohibited by this policy concerning the use of alcohol and/ or drugs.
- 2) Additionally, separate from any DOT and FTA requirements, under the independent authorization of TOWNSHIP OF WEST ORANGE, prior to conducting reasonable suspicion drug and/or alcohol testing, the DER must meet with the employee. At least two management representatives should be present. A management representative must explain to the employee that TOWNSHIP OF WEST ORANGE has determined that he or she is required to submit to reasonable suspicion drug and/or alcohol testing and share the completed Supervisor's Report of Reasonable Suspicion form with the employee. The purpose of the meeting is to provide the employee with an opportunity to provide an explanation for the behavior that provided TOWNSHIP OF WEST ORANGE with reasonable suspicion. TOWNSHIP OF WEST ORANGE's failure to conduct a meeting with the employee prior to mandating reasonable suspicion drug or alcohol testing, however, does not invalidate a positive test result. Reasonable suspicion testing must not

be delayed and when practical, take place within 30 minutes from the time listed observations are made by a trained supervisor.

- 3) Alcohol testing shall be conducted no more than two (2) hours and within (8) hours after the reasonable suspicion determination has been made by the supervisor. Drug testing shall be conducted within thirty-two (32) hours after the reasonable suspicion determination has been made by the trained supervisor or other trained company official. In the event that as required by this section an alcohol test is not administered within eight (8) hours and a drug test is not administered within thirty-two (32) hours following the determination, the DER and TOWNSHIP OF WEST ORANGE shall cease attempts to administer a test and document the reason why the test did not take place.
- 4) Safety sensitive employees are subjected to reasonable suspicion testing for alcohol misuse while performing safety sensitive functions, just before performing safety sensitive functions or, just after performing safety sensitive functions. All safety sensitive employees are subjected to reasonable suspicion testing for drug and alcohol testing anytime while on duty.
- 5) It is the policy of TOWNSHIP OF WEST ORANGE to have a supervisor transport the employee to the appropriate collection site facility and wait for the completion of the collection procedure. The supervisor will then transport the employee back to TOWNSHIP OF WEST ORANGE property, where an individual of the employees' choice will be contacted to transport the employee to his/her residence. If the employee refuses to be transported and attempts to operate his/her personal vehicle TOWNSHIP OF WEST ORANGE will make appropriated efforts to discourage the employee from doing so, up to and including contacting the Police Department. Any employee failing to cooperate with this procedure will be subject to disciplinary action up; to and including termination from the company.

- 6) Additionally, separate from any DOT and FTA requirements, under the independent authorization of TOWNSHIP OF WEST ORANGE, while awaiting the results of a reasonable suspicion screen the employee will be suspended with pay.

F. RETURN TO DUTY TESTING

Where as a safety sensitive employee refuses to submit to a test, has a verified positive drug test, and/or confirmed alcohol test result of 0.04 or greater, TOWNSHIP OF WEST ORANGE before returning the employee to a safety sensitive position will follow the procedures outlined in 49 CFR Part 40.

- 1) Prior to returning to a safety sensitive function, any safety sensitive employee who was determined to have engaged in prohibited drug and/or alcohol misuse -in violations of the Federal Regulations shall undergo a return-to-duty controlled substance and/or alcohol test and will be allowed to return only with a verified negative test result.

All such drug tests will be conducted under directly observed circumstances.

G. FOLLOW-UP TESTING (AFTER RETURNING TO DUTY)

TOWNSHIP OF WEST ORANGE will conduct follow-up testing of each employee who returns to duty, as specified in 49 CFR Part 40.

- 1) Any covered employee who has required a referral, evaluation, and/or treatment by a SAP for prohibited drug use and/or alcohol misuse shall be subject to unannounced follow-up testing plan as directed by the SAP.
- 2) Follow-up testing for alcohol as required by this Section shall be performed just before, during, or immediate after the employee is performing safety sensitive duties.
- 2) In no case shall said drug and/or alcohol testing

occur less than six (6) times in the first 12 months following the covered employee's return to duty nor shall testing extend more than 5 years from the time he or she returned to duty.

All such drug tests will be conducted under directly observed circumstances.

H. Company-mandated Testing Circumstances

*** Additionally, drug and alcohol testing may take place under the independent authorization of TOWNSHIP OF WEST ORANGE and will be conducted in accordance with the applicable provisions of the TOWNSHIP OF WEST ORANGE. However, testing under this Authority of TOWNSHIP OF WEST ORANGE will be performed using Non-DOT Custody and Custody Form.**

VI. DRUG AND ALCOHOL TESTING PROCEDURES

A. COMPLIANCE WITH TESTING PROCEDURES

All drug and alcohol testing procedures in 49 CFR Part 40 applies to all safety sensitive employees of TOWNSHIP OF WEST ORANGE engaged in the performance of safety-sensitive functions for the TOWNSHIP OF WEST ORANGE. This document is available for review at:

TOWNSHIP OF WEST ORANGE
66 Main Street
West Orange, New Jersey 07052
(973) 325-4050

B. BREATH ALCOHOL TECHNICIAN (BAT)

The BAT will perform the functions, and meet all the requirements outlined in 49 CFR Part 40. TOWNSHIP OF WEST ORANGE has a formal agreement with an Occupational Health Center to perform BAT services listed on **Appendix "A"** of this document.

***BAT Collection Certification Documentation is maintained on file at the office of TOWNSHIP OF WEST ORANGE's Third Party Administrator.**

C. SUBSTANCE ABUSE PROFESSIONAL (SAP)

The SAP will perform the functions and meet all the requirements outlined in 49 CFR Part 40. TOWNSHIP OF WEST ORANGE has a formal agreement with the individual to perform SAP services listed on **Appendix "A"** of this document.

***SAP Certification Documentation is maintained on file at the office of TOWNSHIP OF WEST ORANGE's Third Party Administrator.**

D. MEDICAL REVIEW OFFICER (MRO)

The MRO will perform the functions and meet all the requirements outlined in 49 CFR Part 40. TOWNSHIP OF WEST ORANGE has a formal agreement with the individual to perform MRO services listed on **Appendix "A"** of this document.

***MRO Certification Documentation is maintained on file at the office of TOWNSHIP OF WEST ORANGE's Third Party Administrator.**

E. COLLECTION SITE

TOWNSHIP OF WEST ORANGE has a formal agreement with an Occupational Health Center to perform collection services listed on Appendix "A" of this document to provide a clean and compliant location staffed with trained collection site personnel, for the collection of urine to be drug tested in accordance with 49 CFR Part 40.

- 1) All collections performed in accordance with 49 CFR Part 40 drug testing regulations will be split specimen collections.

***Urine Collection Certification Documentation is maintained on file at the office of TOWNSHIP OF WEST ORANGE's Third Party Administrator.**

F. TESTING LABORATORY

In accordance with 49 CFR Part 40 all laboratories testing of urine specimens for prohibited drugs will be performed

through a laboratory certified by the Department of Health and Human Services (DHHS). TOWNSHIP OF WEST ORANGE has a formal agreement with a primary and secondary laboratory to perform drug screen analysis services as listed on **Appendix "A"** of this document.

VII. ADMINISTRATIVE REQUIREMENTS

All safety sensitive employees of TOWNSHIP OF WEST ORANGE will receive a copy of this policy and shall be required to sign and date a receipt for it.

A. EMPLOYEE EDUCATION AND TRAINING

In accordance with 49 CFR Part 655 and 382.601 the TOWNSHIP OF WEST ORANGE will conduct a comprehensive two part-training program for employees as described below:

- 1) The education component shall include display and distribution to every covered employee of:
informational material and a community service hot-line telephone number for employee assistance.

- 2) Safety sensitive employees will receive at least 60 minutes of training on the effects and consequences of prohibited drug use on personal health, safety, and the work environment, and on the signs and symptoms that may indicate prohibited drug use.

Additionally, periodically, employees receive information and training which explain the implications of workplace substance abuse and review TOWNSHIP OF WEST ORANGE's policy regarding drugs and alcohol, including availability of counseling and the company EAP.

B. Supervisor Reasonable Suspicion Training

- 1) The DER, supervisors and other company officials authorized by TOWNSHIP OF WEST ORANGE to make reasonable suspicion determinations shall receive a minimum of 60 minutes training on the physical,

behavioral, and performance indicators of probable drug use and a minimum of 60 minutes training on the physical, behavioral, speech, and performance indicators of probable alcohol misuse.

C. CONFIDENTIALTY AND RETENTION OF RECORDS

TOWNSHIP OF WEST ORANGE will maintain all drug and alcohol testing records in accordance with 49 CFR Part 40, Subpart P.

Additionally, separate from any DOT and FTA requirements, under the independent authorization of TOWNSHIP OF WEST ORANGE, wants to work with and not against employees with drug and/or alcohol problems. Providing confidentiality regarding the problem, any test results, and any disciplinary actions are important parts of company-provided support.

When the employee voluntarily seeks help, he/she can do so confidentially and without fear of reprisal by contacting DER resources, which will not disclose the employee's problem to anyone. The employee's supervisor will be told only that the employee is on medical leave of absence (without disclosing the problem being treated).

When test results are positive—all test results, positive or negative, will be held in strictest confidence. The TPA will communicate test results orally and in writing only to the DER. The Human Resources manager, the DER, and TOWNSHIP OF WEST ORANGE's legal counsel will be the only persons with access to test results.

If a test result is positive, the employee's manager will be informed only that the employee has violated a company policy, with resulting disciplinary consequences. In response to questions by third parties (including coworkers), management and DER's will state nothing other than that the employee has violated company policy, without mentioning the specific policy.

D. ACCESS TO FACILITIES AND RECORDS

TOWNSHIP OF WEST ORANGE in accordance with 49 CFR Part 40 Subpart P, will provide limited access and release of drug and alcohol testing records. In accordance with 49 CFR Part 655.73 and 382.405 TOWNSHIP OF WEST ORANGE grants access to facilities and records to the appropriate Transit representative for the purpose of determining compliance with FTA drug and alcohol testing regulations.

APPENDIX A

- A. Third Party Administrator (TPA)
Care Staton
328 West St. Georges Avenue
Linden, New Jersey 07036
908-925-7519
 - B. Designated Employer Representative (DER)
Bonnie L. Leskanic
66 Main Street
West Orange, New Jersey 07052
973-325-4050
 - C. Collection-sites
Care Station
456 Prospect Avenue
West Orange, New Jersey 07052
973-731-6767
- After Hours Location**
SAME AS C
- D. Breath Alcohol Technician (BAT)
Magdalena Janeczek
Adam Soltan
Marie Lentz
Tonya Saney
Veronica Shilling
Catherine Padilla
Arthur Sainte
Same Address/phone as F
 - E. DHHS approved laboratory
Labcorp
69 First Avenue
Raritan, New Jersey 08869
800-437-4986

- F. Medical Review Officer (MRO)
Richard Bezozo, MD
Care Station
328 W. St. Georges Avenue
Linden, New Jersey 07036
908-925-2273

- G. Substance Abuse Professional (SAP)
David Botti
44 So. Clinton Avenue
P.O. Box 320
Trenton, New Jersey 08625-0230

- H. Employee Assistance Program (EAP)
State of NJ
Employee Advisory Service
200 Woolverton Avenue
Trenton, New Jersey 08625-0320
609-292-8544