



NATIONAL TRANSPORTATION SAFETY BOARD

Office of Research and Engineering
Washington, DC

Medical Factual Report

July 21, 2017

Nicholas Webster, MD, MPH
Medical Officer

A. ACCIDENT: DCA17FR003

Accident Type: Collision of two Southeastern Pennsylvania Transportation Authority (SEPTA) trolleys.

Location: Philadelphia, Pennsylvania

Date: January 04, 2017

Time: around 12:47 p.m. EST

Vehicle 1: SEPTA trolley (No. 9085) struck rear of stationary vehicle 2

Vehicle 2: SEPTA trolley (No. 9101)

B. GROUP IDENTIFICATION: MEDICAL FACTORS GROUP

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Southeastern Pennsylvania Transportation Authority
Medical Director

C. RELEVANT REGULATIONS, PROTOCOLS AND MEDICAL CONDITIONS

SEPTA Medical and Drug and Alcohol Protocols

According to correspondence from the SEPTA medical department, as of January 2017, its staff of 16 provides occupational medicine support to over 4500 SEPTA safety sensitive employees including approximately 2200 bus operators and over 300 trolley safety sensitive employees.

According to the SEPTA Medical Services Department, SEPTA trolley operators undergo a pre-employment medical examination but are exempt from periodic medical

examinations. Unlike railroad operators, who triennially must meet hearing and vision standards as required by the Federal Railroad Administration, trolley operators are not subject to any federally required medical examinations. In addition, many trolley operators are also commercial motor vehicle operators and under Pennsylvania law, motor vehicle drivers who are employed by the Federal government, a state, or any political subdivision of a state who operate in intrastate or interstate commerce are not subject to the federal physical qualifications and examination regulations; SEPTA does not require periodic examinations of these drivers.

Although periodic examinations are not conducted, SEPTA obtains health information from its trolley operators and motor vehicle drivers through sick leave applications, prescriber reports, FMLA applications, return-to-work evaluations, employee self-reporting, and health provider reports. The medical department monitors all safety sensitive employees identified as having potential impairing conditions including high blood pressure, diabetes, coronary artery disease, sleep disorders and psychiatric disorders.^{1,2} Depending on the nature and symptomatology of the disorder, employees are monitored on a periodic basis ranging from every three months to annually. Fitness for duty decisions are based on standards and recommendations promulgated by the Federal Motor Carrier Safety Administration (FMCSA).

Operators' fitness for duty is covered under the SEPTA Rail Operations Division, Authority Standard Rules (ASR), which govern all SEPTA rail employees. ASR-4, Fitness for Duty, states "Employees must not perform any service while affected by any condition that could impair their ability to perform their duties properly. Such conditions include fatigue, use and effects of over the counter (OTC) medications, personal situations that impact alertness or one's ability to concentrate, etc. Employees must notify the Authority Medical Department of any condition not already on record that could impair their ability to perform their duties."

Title 49 Code of Federal Regulations (CFR) part 655 is the Federal Transit Authority (FTA) drug and alcohol program that guides the SEPTA trolley operator's drug and alcohol program. SEPTA trolley operators are subject to pre-employment, postaccident, reasonable suspicion, random, and return to duty/follow-up testing. Drug testing includes the mandatory FTA urine testing for amphetamine, methamphetamine, cocaine metabolites (benzoylecgonine), opiates (codeine, morphine, and heroin's metabolite 6-acetylmorphine), phencyclidine, methylenedioxymethamphetamine (MDMA), methylenedioxyamphetamine (MDA), Methylenedioxyethylamphetamine (MDEA), and marijuana's metabolite delta-9-tetrahydrocannabinol-9-carboxylic acid (THCA).³ Additionally, SEPTA notifies employees that testing includes barbiturates, benzodiazepines, methadone, and propoxyphene. (Attachment 1, Appendix B) Urine testing identifies past drug use but not impairment at the time of specimen collection. Unlike workers subject to Federal Railroad Administration regulations, postaccident testing for trolley operators does not include the common sedating antihistamines like diphenhydramine.

¹ According to 49 CFR 655.4 the Federal Transit Authority (FTA) defines safety-sensitive functions and includes employees operating a revenue service vehicle, including when not in revenue service.

² Trolley drivers serve a safety sensitive function and are safety sensitive employees.

³ US Department of Transportation, Drug and Alcohol testing DOT Rule 49 CFR Part 40 Section 40.87 - cutoff concentrations for drug tests. <https://www.transportation.gov/odapc/part40/40-87> Accessed 06/02/2017

SEPTA provides all new hires a drug and alcohol orientation, which includes training on SEPTA's Drug free workplace policy.⁴ Appendix E of the Drug Free Workplace Manual, (Attachment 1) provides guidance to workers on prescription medications, non-prescription cough, cold remedies, and antihistamines. The section on non-prescription medications states: "Not required to be reported, but employees should pay particular attention to labels indicating drowsiness or restrictions regarding driving and/or working around machinery, and adjust their dosage and work schedule accordingly. Further, Appendix E documents the following trade names of sedating medications "Benadryl, Bromfed, Chlortrimeton, Comtrex, Contac, Deconamine, Dimetapp, Dristan, Drixoral, Extendryl, Fedahist, Kronofed, Naldecon, Nalamine, Novafed, Nyquil, Ornade, Phenergan, Rondec, Rynatan, Sinubid, Sinulin, Tavist-D." The list does not include the generic name diphenhydramine or the CVS brand "*Nighttime Severe Cough & Cold*" medicine. At the time of the accident, no refresher training on the effects of prescription or over the counter medication was provided.

D. DETAILS OF INVESTIGATION

Purpose

This investigation was performed to evaluate the striking trolley operator for any medical conditions, use of medications/illicit drugs, or the presence of any toxins. The medical investigation did not review records of the stationary trolley operator. Additionally, the investigation evaluated the conduct and oversight of SEPTA occupational medicine evaluations of safety sensitive personnel and guidance for use of prescription and OTC medications.

Methods

The striking trolley operator's SEPTA occupational health records, Federal Transit Administration (FTA) postaccident toxicology reports, and postaccident medical treatment records were reviewed. Additionally, SEPTA occupational medicine policies and procedures for occupational medicine oversight and guidance for safety sensitive personnel were reviewed.

Striking Trolley Operator

SEPTA Medical File

According to SEPTA occupational medical records, the 62-year-old male trolley operator's only record of examination was a commercial driver's examination conducted by a SEPTA physician's assistant dated January 15, 2014. The examination recorded his uncorrected visual acuity was 20/40 in each eye; corrected visual acuity was not recorded. His field of vision was 130 Degrees in each eye and he met color vision and hearing standards.⁵ The operator's height was recorded as 6 feet 7 inches and his weight was 200 pounds. The operator reported no medical conditions and no other medications other than vitamins. The examining physician's assistant found no significant abnormalities on examination. Additionally, the driver completed the SEPTA Berlin Questionnaire Sleep Evaluation form, which indicated that he was not likely to have a sleep breathing

⁴ On January 27, 2014, the trolley operator signed a form indicating he had received this training. The investigation did not identify documentation of recurrent training.

⁵ According to CDL examination rules 49 CFR391.41, Each person shall have visual acuity that meets or exceeds the following thresholds: (1) for distant viewing either,

- (i) Distant visual acuity of at least 20/40 (Snellen) in each eye without corrective lenses or
- (ii) Distant visual acuity separately corrected to at least 20/40 (Snellen) with corrective lenses and distant binocular acuity of at least 20/40 (Snellen) in both eyes with or without corrective lenses.

disorder.⁶ He was found medically qualified for commercial driving with no limitations.

Postaccident Emergency Treatment Records

According to emergency treatment records, the 62-year-old male operator reported his trolley struck the trolley ahead of him. The record documented the operator stated he took an OTC nighttime cold medicine and was groggy. No abnormal physical / neurological findings were documented on his physical examination. Imaging studies and laboratory tests were not performed. According to the records, his discharge diagnosis was MVC [motor vehicle collision]; no injuries were documented.

Postaccident Eye Evaluation

Following a request from the NTSB, SEPTA medical department tested the trolley operator's vision on February 1, 2017 and recorded his vision as 20/40 in both eyes without correction. The SEPTA exam documented that the vision was unchanged from his January 15, 2014 examination.

Postaccident Interview and Email Communication

According to the driver, he had had a cold for a few days before the accident with symptoms of head congestion. At about 5 pm the night before the accident and then at 0900 in the morning (about 3 hours and 45 minutes before the accident) he drank tea to which he added a packet of CVS brand Nighttime Severe Cough & Cold medication. The product information states each packet contains 650 mg of acetaminophen, 25 mg of diphenhydramine and 10 mg of phenylephrine. The packet has the warnings including "marked drowsiness may occur" and "be careful when driving a motor vehicle or operating machinery" and recommends re-dosing every 4 hours.⁷

Acetaminophen is a non-sedating pain and fever control drug found in many OTC combination cold and pain medicines and is commonly known as Tylenol.⁸ Diphenhydramine is a sedating antihistamine used to treat allergy symptoms and as a sleep aid. It is available over the counter in many combination cold and flu medications and non-prescription sleep aids and is sold with names including Benadryl and Unisom. Diphenhydramine carries the following FDA warning: may impair mental and/or physical ability required for the performance of potentially hazardous tasks (e.g., driving, operating heavy machinery).⁹ Compared to other antihistamines, diphenhydramine causes marked sedation; this is the rationale for its use as a sleep aid. Altered mood and impaired cognitive and psychomotor performance may also be observed. In fact, in a driving simulator study, a single 50 mg dose of diphenhydramine impaired driving ability more than a blood alcohol

⁶ Netzer NC., et al. Using the Berlin Questionnaire to Identify Patients at Risk for the Sleep Apnea Syndrome. *Ann Intern Med.* 1999; 131:485-491.

⁷ CVS Health Severe Cough & Cold Drink Packets <http://www.cvs.com/shop/health-medicine/cough-cold-flu/cough-cold-medicine/cvs-health-severe-cough-cold-drink-packets-prodid-1011693#/#Directions> Accessed 06/02/2017

⁸ National Library of Medicine (U.S.). 2017. *DailyMed*. Bethesda, MD: U.S. National Library of Medicine, National Institutes of Health, Health & Human Services. TYLENOL EXTRA STRENGTH- acetaminophen. <https://dailymed.nlm.nih.gov/dailymed/drugInfo.cfm?setid=59773893-09a8-47a2-943a-e9ea9da4458a> Accessed 01/30/2017

⁹ Federal Aviation Administration, Forensic Toxicology's WebDrugs, Diphenhydramine. <http://jag.cami.jccbi.gov/toxicology/DrugDetail.asp?did=50>

concentration of 0.100 gm/dl.¹⁰ Phenylephrine is a non-sedating OTC decongestant found in many combination medications.¹¹

Toxicology

LabCorp performed the DOT mandated postaccident toxicological testing. Urine collected January 04, 2017 at 6:48 p.m. was negative for tested-for-drugs.¹² Additionally, DOT postaccident breath testing for alcohol performed by a SEPTA alcohol technician on January 04, 2017 at 6:46 p.m., was negative.

E. SEPTA POSTACCIDENT ACTIONS

According to correspondence from the SEPTA Safety Department, on June 22, 2017 the SEPTA Medical Department distributed a Medical Department Advisory for Over the Counter Medications. (Attachment 2) The notice discusses OTC sedating medications and recommends employees choose medications carefully, read, and follow the advice on the labels. Additionally, the document specifically discusses diphenhydramine, the sedating antihistamine used by the trolley operator in this accident. Finally, the advisory notice was sent to supervisory, administrative and management employees via email and was posted in every employee reporting location.

F. SUMMARY OF MEDICAL FINDINGS

The 62-year-old trolley operator had an upper respiratory infection with symptoms of head congestion for a few days before the accident and reported feeling unwell. He self-treated with an OTC medication containing the sedating antihistamine diphenhydramine on the morning of the accident. He reported he was otherwise in good health and took no medications. Postaccident urine drug testing and alcohol breath testing was negative for tested-for substances.

SEPTA's ASR-4 specifically states, "employees must not perform any service while affected by any condition that could impair their ability to perform their duties properly. Such conditions include fatigue, use and effect of OTC medications, personal situations that impact alertness or one's ability to concentrate." Additionally, the SEPTA Drug Free Workplace Manual provides employees with information about prescription and OTC medications and but does not specifically discuss the generic name of the medications used by the driver. Further, the manual instructs employees to pay particular attention to labels indicating drowsiness or restrictions regarding driving and/or working around machinery, and adjust their dosage and work schedule accordingly.

As part of a postaccident safety initiative, the SEPTA Medical Department distributed an Advisory Notice to all employees discussing best practices when using OTC medications. The notice recommends employees choose medications carefully, read, and follow the advice on the labels. The notice specifically discusses the sedating antihistamine diphenhydramine.

¹⁰ Weiler JM, et al. Effects of fexofenadine, diphenhydramine, and alcohol on driving performance. A randomized, placebo-controlled trial in the Iowa Driving Simulator. *Ann Intern Med.* 2000;132(5): 354-63.

¹¹ National Library of Medicine (U.S.). 2017. *DailyMed*. Bethesda, MD: U.S. National Library of Medicine, National Institutes of Health, Health & Human Services. NASAL DECONGESTANT PE MAXIMUM STRENGTH NONDROWSY- phenylephrine. <https://dailymed.nlm.nih.gov/dailymed/drugInfo.cfm?setid=7aef00df-816a-4ea2-a2ad-beed66dd2fe4> Accessed 01/30/2017

¹² LabCorp laboratory tested urine for amphetamines, cocaine metabolites, opiates, phencyclidine, marijuana metabolites - cutoff levels are defined in 49 CFR 40.87 <https://www.transportation.gov/odapc/part40/40-87> . Accessed 07/21/2017

ATTACHMENT 1 - Medical Factual Report

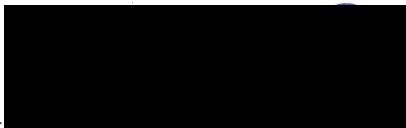
DCA17FR003 - Philadelphia, Pennsylvania, January 4, 2017



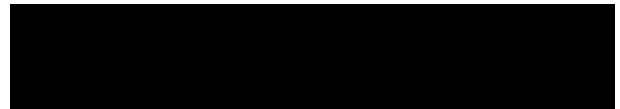
Drug Free Workplace Program Manual

***Southeastern Pennsylvania Transportation Authority
1234 Market Street
Philadelphia, Pennsylvania 19107***

Revised May 8, 2014



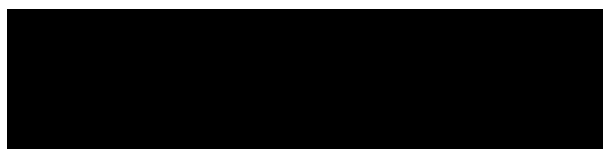
Medical Director



**Senior Director
Employee Services**



**Assistant General Manager
Human Resources**



General Manager

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I. INTRODUCTION

A. SEPTA'S Anti-Drug Policy: A History

The involvement of the use of alcohol in automobile accidents and fatalities today accounts for more than 50,000 deaths a year on our roads and highways. Since the United States became an automotive society in the early 1900's, alcohol-related deaths and injuries have risen steadily. SEPTA has not been immune to this problem.

In 1985, SEPTA instituted post-accident and reasonable suspicion testing for alcohol. It was hoped that an employee's knowledge of such testing would have deterrent effects, and that alcohol use on the job would cease being a contributing factor to accidents. Unfortunately this did not prove to be the case, and over the years the percentage of post-accident and reasonable suspicion tests that were positive for alcohol stayed level, and even rose in some time periods. Coupled with this long-standing problem with alcohol, in the 1960's, experimentation and use of other drugs, especially marijuana and cocaine, began to spread into all segments of our society, compounding even more issues of operator impairment in accidents.

With much fanfare and justifiable pride, in 1986 SEPTA opened the Commuter Connection Tunnel, linking the old Penn Central lines from Suburban Station with the old Reading lines at Reading Terminal. For the first time, the entire regional rail system was linked so that rail customers could travel to both ends of the rail system without having to transfer between two unconnected terminals. The building of the Commuter Connection Tunnel was a remarkable engineering feat which won both professional awards from city planners and praise from riders.

Shortly after the Connection was opened, in January 1987, two trains collided on the connecting tracks between Market East and Suburban Station. Based on post-accident testing rules, six crew members on the two trains were tested for drugs and alcohol, and three were positive for controlled substances. These test results convinced SEPTA that something had to be done to protect our riders, our employees, and our equipment. The General Manager immediately issued Notice 87-1, announcing the implementation of a random drug testing program for safety sensitive employees.

Shortly after random testing was implemented under Notice 87-1, the Transport Worker's Union, Local 234, joined later by other bargaining units, sought an injunction to block random testing, raising in their complaint various constitutional issues related to privacy. The case was heard by the Honorable Edmund V. Ludwig, in the Federal District Court for the Eastern District of Pennsylvania. Extensive testimony was taken on all sides of the issue. Throughout the case, Judge Ludwig urged all parties to come to a mutual settlement of the issues, as various laws and regulations were then working their way through Congress and the federal regulatory agencies, and under

those conditions, a mutual agreement was preferable to an order by the Court.

The unions and SEPTA did reach such an agreement, and in January 1988, Judge Ludwig announced that the parties had agreed to, and would implement, The Integrated Program of Education, Assistance, and Testing for Intoxicants and Controlled Substances (the Integrated Program). In his decision, Judge Ludwig found that SEPTA's need to randomly test employees was constitutional when the privacy rights of employees were weighed against the need to operate the system safely. The Integrated Program allowed SEPTA to conduct random testing, if it also provided drug-related information and education, and treatment. This decision led SEPTA to establish a three-element program, consisting of education, an employee assistance program, and testing.

Random testing for City and Suburban Division employees began under the Integrated Program in September 1989. Judge Ludwig did not extend the Integrated Program to cover Regional Rail Division (RRD) employees. He ruled that under federal labor laws, the matter had to be resolved in contract negotiations with the various rail unions. Under new Federal Railroad Administration (FRA) anti-drug rules, SEPTA began random testing of RRD employees in late 1989. By early 1990, all safety sensitive employees at SEPTA were subject to random testing as a matter of policy, contract or regulation.

At the same time that SEPTA was acting under the authority of the Integrated Program, the Congress was writing new laws in response to the nation's drug problems, and the various executive regulatory agencies were issuing rules and regulations to implement those laws. Congress wrote, and the President signed into law, The Drug-Free Workplace Act of 1986. This law requires all Federal contractors and grantees, even in fields other than transportation, to issue statements prohibiting workplace drug use, and to develop policies to ban the use of drugs at work.

In 1989, The Urban Mass Transportation Agency (UMTA), part of the Department of Transportation (DOT), announced rules for drug and alcohol testing by transit agencies, including SEPTA. Various national unions again went to Court to block UMTA's action, and the Court ruled that UMTA had overstepped its authority in issuing such regulations, since as tasked by Congress, it was a funding, and not a regulatory agency. In response to this ruling, other transit agencies around the nation ceased testing, but since SEPTA had negotiated testing programs within its various union contracts, testing under the Integrated Program was able to continue.

Through the Omnibus Transportation Employee Testing Act of 1991, Congress instructed the divisions of the DOT, including the Federal Highway Administration, FTA (the successor to UMTA) and FRA, to develop and issue comprehensive multi modal regulations for all transit agencies to implement testing programs. Those rules are found in volume 49 of the Code of Federal Regulations (CFR). SEPTA is governed by:

1. 49 CFR Part 29, The Drug-Free Workplace Act of 1988;
2. 49 CFR Part 219, Control of Alcohol and Drug Use, Department of Transportation, Federal Railroad Administration
3. 49 CFR Part 382, Controlled Substances and Alcohol Use and Testing, Department of Transportation, Federal Motor Carrier Safety Administration; and
4. 49 CFR Part 655, Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations, Federal Transit Administration.

Additionally, uniform laboratory and testing procedures for all of the mandated programs were established in:

5. 49 CFR Part 40, Procedures for Transportation Workplace Drug and Alcohol Testing Programs, Department of Transportation, Office of the Secretary of Transportation.

B. Statement of Policy

This document comprises SEPTA's Drug Free Workplace Policy. This Policy, the Drug Free Workplace Act of 1988 (49 CFR Part 29), and the United States Department of Transportation's regulations (49 CFR Parts 40, 219, 382, and 655) supersede and replace the Integrated Program of 1988.

This Policy is implemented via three elements:

1. *Education*: A Wellness Program, providing lifestyle-enhancement educational services, inclusive but not limited to drugs, alcohol and related matters, and an anti-drug and alcohol training program, providing all employees and their supervisors with training on: the effects of drugs and alcohol, Authority policy and procedures, the features of the drug treatment and testing programs, and the consequences of positive tests;
2. *Assistance*: An Employee Assistance Program for all employees and their dependents (including but not limited to employees troubled by drugs and/or alcohol), providing preventive and therapeutic services for all problems of living; and
3. *Testing*: A Drug and Alcohol Testing Program for all employees and applicants for hire.

C. Responsible Officials

Employees may direct all questions concerning this Drug-Free Workplace Policy to any of the following SEPTA staff, who are responsible for the implementation of this Policy:

1. The **Medical Director**, for questions about general medical policy issues and/or the Employee Assistance Program;
2. The **Medical Review Officer (MRO)**, for questions about test result interpretation;
3. The **Laboratory Manager**, for questions about testing procedures and compliance with regulations; and
4. The **Substance Abuse Professional (SAP)**, for questions about treatment, returning to work, aftercare, and follow-up.

Telephone numbers for these persons are published in the Authority's official telephone directory. Their numbers can also be obtained from any division or department head. If these designated contact persons cannot answer your questions, they will direct you to someone who can or will research the question and return your call with an answer.

D. Definitions and Abbreviations

The following definitions and abbreviations are used in this Policy:

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. Submission of an Adulterated Specimen is a refusal to test.

Advisory Committee. A committee comprised of the managers of each of the operating divisions and one member of each labor organization representing affected Authority personnel that is informed of any changes to this Policy.

Alcohol. Beverages, medications, or foods including beer, wine, and distilled spirits, containing alcohol, including methyl and isopropyl alcohols.

Canceled or Invalid Test. In urine testing: a test that has not taken place, a specimen that cannot be analyzed by a laboratory, or a test that is declared invalid by the Medical Review Officer (MRO). For instance, a urine specimen that is rejected by the laboratory is a canceled test.

In breath testing: a test that is deemed to be invalid under 49 CFR Part 40.

A canceled test is neither positive nor negative. It is also different from the behavior that constitutes a refusal to submit to testing. When a test is canceled, the employee will be required to submit a new specimen, and (for DOT-required tests) the MRO shall report the cancellation (and the reasons for it) to the DOT, the Authority, and the donor.

Collection Site. A place designated by SEPTA where donors present themselves for the purpose of providing a specimen of urine and/or breath to be analyzed for the presence of drugs and/or alcohol.

Collection Site Person. A person who instructs and assists donors at a collection site and who receives and makes a screening examination of the urine specimen provided by those donors. A collection site person may also be a Breath Alcohol Technician, and vice versa.

Confirmation or Confirmatory Test. In drug testing, a second analytical procedure to identify the presence of a specific drug metabolite that is independent of the screening test and that uses a different technique and chemical principle from that of the screening test in order to ensure reliability and accuracy. Gas chromatography/mass spectrometry is the only authorized confirmation method for cocaine, marijuana, opiates, amphetamines, and phencyclidine. In alcohol testing, a second test following a screening test with a result of 0.02 or greater that provides quantitative data of alcohol concentration.

Confirmed Positive (Breath). A positive result in a second test, following a screening test.

Confirmed Positive (Urine). A positive result in a confirmatory test performed by GC/MS on an aliquot of urine that tested positive by a screening test.

Covered Employee. A person, including an applicant or transferee, who performs a safety-sensitive function as defined by the DOT and is subject to 49 CFR Parts 219, 382, or 655.

DHHS. United States Department of Health and Human Services.

DHHS Drug Panel. The controlled drugs listed in section 102(6) of the Controlled Substances Act that have been determined as being a risk to public safety, and required to be tested for by 49 CFR 40. See Appendix A.

Donor. An individual who has been selected to submit to a drug and/or alcohol test. Donors are usually employees or candidates for hire.

DOT. United States Department of Transportation.

Drugs. Any substance that has psychoactive effects.

EAP. Employee Assistance Program.

EBT. Evidential Breath Tester: a breath alcohol testing device approved by the National Highway Traffic Safety Administration.

FMCSA. U.S. Federal Motor Carrier Safety Administration (formerly Federal Highway Administration).

FRA. U.S. Federal Railroad Administration.

FTA. U.S. Federal Transit Administration.

GC/MS. Gas Chromatography/Mass Spectrometry: An accurate, reliable testing procedure used to confirm the presence in urine of a controlled substance detected by an initial screening test.

Initial Test or Screening Test. In drug testing, an immunoassay screen to eliminate "negative" urine specimens from further analysis.

In alcohol testing, an analytic procedure to determine whether a donor may have a prohibited concentration of alcohol in a breath specimen.

MRO. Medical Review Officer: A licensed physician who not only has knowledge of substance abuse disorders, but who also has been trained to interpret and evaluate laboratory test results in conjunction with an employee's medical history. The MRO verifies a confirmed positive test result by reviewing a laboratory report, an employee's medical history, and (if applicable) the findings of a medical examination) to determine whether there is a legitimate, medical explanation.

Multi-Modal. Covered by more than one DOT agency, and/or referring to the modes of public transportation such as bus, trolley, subway/elevated, light rail, and heavy rail.

NHTSA. National Highway Traffic Safety Administration.

Non-RRD Employees. Employees of all operating and support divisions of SEPTA other than the Regional Rail Division.

Observed Conditions. A procedure in which an employee is under the direct observation of Supervisory and/or Medical Department personnel of the same gender from the time the employee is notified of selection for a drug and alcohol test through and including direct observation (in the Collection Site) of the specimen collection process. The observed employee must report immediately and directly to the Collection Site, accompanied by Supervisory and/or Medical Department personnel, upon notification of selection; s/he will not be permitted to smoke, eat or use rest room facilities until after the specimen(s) are provided.

An employee shall only be placed under observed conditions if there is reason to believe he or she may alter or substitute the specimen to be provided. The following circumstances are examples of reasons to believe that the individual may alter or substitute the specimen:

1. The employee has presented a urine specimen that falls outside the temperature range (32 - 38 degrees Celsius or 90 - 100 degrees Fahrenheit), or
2. The collection site person observes conduct clearly and unequivocally indicating an attempt to tamper with the sample; or
3. The employee has previously been determined to have used a controlled substance without medical authorization; or

4. The previous specimen fails validity testing in the laboratory.

Performing a Safety-Sensitive Function. An employee is considered to be performing a Safety-Sensitive function during any period in which s/he is actually performing, ready to perform, or immediately available to perform such a function.

Positive Test (Breath). In breath testing, the presence of alcohol in the body of a concentration of 0.04 or greater as measured by an Evidential Breath Testing (EBT) device.

Positive Test (Urine). In urine testing, a positive test is one in which the laboratory reports the confirmed presence of a tested-for substance at or above the cutoff by appropriate testing.

Pre-duty. The period of time beginning four hours prior to the employee's scheduled reporting time.

Prescriber. A healthcare professional licensed to prescribe medication.

PPO. The Preferred Provider Organization used by the EAP.

RRD. SEPTA's Regional Rail Division.

Random Selection Testing Procedures. SEPTA retains an outside consulting firm to generate the random selection list by a scientifically valid method, such as a random number table or a computer-based random number generator. Periodically, SEPTA's Information Technology Department will provide the consultant with a computer file listing all current employees. The consultant will create the random testing list from that file, selecting all employees in the various Safety Sensitive Positions, and constructing a random sample with replacement from the testing pools. Each random selection shall include the time of day for the test (i.e., beginning, middle or end of the employee's shift). Eligibility Pools will be based strictly upon assignment to FTA, FRA, or SEPTA pools without stratification along collective bargaining unit lines. Per both the FRA and FTA, stratification prevents each employee from having an equal statistical chance of being selected each and every work day. "Random" means that each person in the testing pool has equal probability of being selected each day, and that no effort is made to select any particular employee. Sampling "with replacement" means that everyone is in the testing pool each selection period, regardless of whether they have been previously selected. Random tests are to be spread reasonably throughout the year in a non-predictable pattern.

In summary, each eligible employee has an equal statistical chance of being selected each and every work day.

Selection Rate. The selection rate is defined as the percentage of test-eligible employees who will be tested during a calendar year. Because of the nature of random testing with replacement, based on the "luck of the draw,"

many employees will be selected more than once, and some employees may not be selected for extended periods of time. Because of this, selection rate always refers to the number of tests conducted, not the number of different employees tested. The selection rate is set based upon annual drug and alcohol testing rates established by the US Department of Transportation.

Notification and Reporting for Testing. Employees may be sent for random tests just before or at any time during their work shift. Upon notification, the employee must report immediately and directly to the Collection Site, comply with all testing procedures, and report immediately and directly back to the job upon completion of the testing process.

Reasonable Suspicion. A specific contemporaneous and articulable observation that gives a SEPTA supervisor or other management personnel trained in detecting the signs and symptoms of drug and alcohol use cause to believe, in good faith on the basis that a reasonable person would employ, that an employee has violated the alcohol prohibitions of this Policy or has used an illegal controlled substance. Slurred speech, unsteady gait, poor gross or fine motor functioning, unusual or uncharacteristic behavior, bloodshot eyes, extremely large or small pupils, unusual body or breath odor, poor conceptualization, a constant runny nose or persistent congestion otherwise unattributable to allergies or the common cold, unusual lethargy or bursts of energy, uncharacteristic episodes of lateness or leaving early, frequent or prolonged absences from an assigned work area, and deteriorating job performance are many, but not all, of the characteristics which may give rise to Reasonable Suspicion. Violation of a serious safety rule by any employee may give rise to Reasonable Suspicion.

Refusal to Submit to an Alcohol or Drug Test. Refusal includes but is not limited to the following behavior:

- Fail to appear for any test (except a pre-employment test) within a reasonable time (within 2 hours) after being directed to do so.
- Fail to remain at the testing site until the testing process is complete.
- Fail to provide a urine specimen for any drug test required by DOT regulations or SEPTA Drug-Free Workplace Policy.
- In the case of a directly observed or monitored collection in a drug test, fail to permit the observation or monitoring of the provision of a specimen.
- Fail to provide a sufficient amount of urine when directed, and it has been determined, through a required medical evaluation, that there was no adequate medical explanation for the failure.
- Fail or decline to take an additional drug test the employer or collector has directed the donor to take.
- Fail to undergo a medical examination or evaluation, as directed by the MRO as part of the verification process, or as directed by the DER
- Fail to cooperate with any part of the testing process (e.g., refuse to empty pockets when directed by the collector, behave in a confrontational way that disrupts the collection process, fail to wash hands after being directed to do so by the collector).

- For an observed collection, fail to follow the observer's instructions to raise your clothing above the waist, lower clothing and underpants, and to turn around to permit the observer to determine if the donor has any type of prosthetic or other device that could be used to interfere with the collection process.
- Possess or wear a prosthetic or other device that could be used to interfere with the collection process.
- Admit to the collector or MRO that the specimen was adulterated or substituted.
- MRO verification of a test as adulterated or substituted.
- Refusal to sign the breath alcohol certification at Step 2.
- Turning in sick after notification to report for testing
- Undocumented "family emergencies" following notification
- Tampering with breath or urine specimens, procedures or documentation
- Leaving the scene of an accident or failing to remain available for necessary testing after an accident before necessary tests have been conducted without a valid medical explanation
- Use of alcohol within eight hours of an accident.

SEPTA Safety-Sensitive Employees. Employees who perform Safety-Sensitive Functions or occupy Safety-Sensitive Positions.

Safety-Sensitive Functions or Positions. Positions or duties in which a diminishment of the employee's ability to perform the necessary elements of the position may result in damage or injury to SEPTA's passengers, employees, other individuals, equipment, or operations.

Subject to Duty. An employee is subject to duty:

1. On his/her regularly scheduled duty days;
2. When actually reporting to work;
3. When returning from an absence, including but not limited to a vacation, illness, or injury;
4. When approved for work by the Medical Department;
5. When the employee has volunteered for extra work on a day off, vacation day, or time she or he is not regularly scheduled to work;
6. When told in advance, while on duty, that he or she is expected to be on duty at some point in the future, during that projected period.

SAP. Substance Abuse Professional: A professional with knowledge and clinical experience in the diagnosis and treatment of both drug and alcohol-related disorders. The SAP may be a licensed physician; a licensed psychologist; a licensed social worker; an employee assistance professional; or an addiction counselor certified by the National Association of Alcoholism and Drug Abuse Counselors Certification Commission. With regard to DOT

alcohol regulations, the SAP is an employee of the Authority's Employee Assistance Program.

SEPTA Panel. The panel of substances tested for when testing under SEPTA testing regulations. See Appendix A for the listing.

Substituted Specimen. A specimen with creatinine and specific gravity values that are so diminished that they are not consistent with human urine. Submission of a Substituted Specimen is a refusal to test.

Tampering [Breath Specimen] In breath specimens, tampering includes but is not limited to the use of any physical, chemical, liquid, vaporous, electronic or other means of attempting to invalidate or negate a breath test.

Tampering [Urine Specimen]. In urine specimens, tampering includes, but is not limited to: addition of liquid or solid chemicals or other substances to the urine container; adding water to the urine container; heating or cooling the urine and/or the container; or submitting someone else's sample as one's own; causing the production of urine that is sufficiently dilute as to preclude detection of substances therein, such as by ingestion of excessive amounts of water or other liquids, use of diuretics or other means.

Verified Negative Drug Test Result. A drug test result reviewed by a medical review officer and determined not to have evidence of prohibited drug use.

Verified Positive Drug Test Result. A drug test result reviewed by a medical review officer and determined to have evidence of prohibited drug use.

II. STANDARDS OF CONDUCT

A. Prohibitions

SEPTA prohibits the following activities while employees are on duty, Subject to Duty, Pre-duty, on SEPTA property or in SEPTA vehicles, or when involved with SEPTA business while not on SEPTA property:

1. The unlawful manufacture, distribution, dispensing, sale, possession, use or measurable presence in the body of drugs or any other unauthorized controlled substances which include but are not limited to over-the-counter patent medications and medications prescribed for others;
2. The unauthorized distribution, sale, possession, use or measurable presence in the body of alcohol in any form, including beverages, foods, medications or other products;
3. The unauthorized distribution, dispensing sale, manufacture possession or use of any illicit substances and/or intoxicants.

B. Drug Convictions

As per the Drug Free Workplace Act of 1988, any employee who is convicted under any criminal drug statute for a violation occurring in the workplace shall report the conviction to the Inspector General within five (5) calendar days of the conviction. A conviction includes any finding of guilt, including a plea of guilty or nolo contendere, or any imposition of a sentence, or both, by a judicial body charged with the responsibility to determine violations of federal or state criminal drug statutes.

C. Prescription Drugs in Safety-Sensitive Work

SEPTA regulations require that an employee in a Safety Sensitive Position who intends to work while taking a prescribed medication that is a controlled or potentially sedating substance must submit a written report from the Prescriber. This report shall contain the names of the medication(s), dosages and duration of treatment as well as a statement documenting the Prescriber's recommendation of the medication(s) in view of the safety sensitive nature of the employee's work. A form for the Prescriber's report and a list of reportable drugs are attached as Appendix E and F.

SEPTA will maintain the confidentiality of any prescription information reported by an employee or Prescriber pursuant to this provision and will not publicize the reason for an employee's temporary withdrawal from Safety-Sensitive service under this provision.

D. Alcohol Use

The consumption of beverages, food, or substances (including medication) containing alcohol and the presence of alcohol in the body at a concentration of 0.02 and above while on duty, Subject to Duty, Pre-duty, or on-call is strictly prohibited. Alcohol misuse causes many problems for individuals in their health, work and personal life, such as anxiety, depression, insomnia, divorce, social isolation, job loss, and suicide. When misused in a safety-sensitive environment such as transit, alcohol may cause accidents, injury and death. Co-workers and/or supervisors may refer employees suspected of misusing alcohol to the Authority's EAP for assessment and treatment as

needed. Supervisors who, in the workplace, observe signs of alcohol use must confront the employee and take appropriate action, such as removing the employee from service and ordering breath testing.

1. Pre-Duty Use of Alcohol

a) **General**

An employee in a Safety Sensitive Position shall not consume alcohol within four hours of reporting, nor after receiving notice to report for work. An employee in a Safety Sensitive Position must inform SEPTA prior to physically reporting to her/his work location if s/he has consumed alcohol during the Pre-duty period. Four hours may not be a sufficient amount of time for an employee to be deemed alcohol free, and compliance with this provision does not constitute a defense to a positive test.

b) **On-call**

An employee in a Safety Sensitive Position shall not consume alcohol for four hours prior to, nor during, the on-call period. An employee in a Safety Sensitive Position must inform SEPTA prior to physically reporting to her/his work location if s/he has consumed alcohol within four hours prior to or during the on-call period. However, four hours may not be a sufficient amount of time for an employee to be deemed alcohol free, and compliance with this provision does not constitute a defense to a positive test.

c) **Unexpected Duty**

An employee in a Safety Sensitive Position who has used alcohol within four hours of the time s/he is unexpectedly called to report to duty shall notify her/his supervisor of that fact immediately upon receipt of the call, and shall not attempt to perform work until four hours after consumption and then only after a breath test indicates an alcohol concentration of less than 0.02.

2. Use of Alcohol Following an Accident

An employee involved in an on-duty accident may not consume alcohol for 8 hours following the accident, or until tested, whichever occurs first.

III. **DRUG AND ALCOHOL TESTING**

A. **Multi-Modal Testing Authority**

Under the Drug Free Workplace Policy, employees may be subject to drug and alcohol testing under SEPTA regulations and/or Federal regulations. Regulations unique to each program (FRA, FTA, and SEPTA)¹ are discussed below. Any time a test is ordered, an employee will be given a clear explanation about what type of test is being ordered and under what regulatory authority it is being ordered.

B. Testing of Regional Rail Division Employees Under FRA Regulations

RRD Employees will be tested and disciplined in accordance with FRA Regulations (49 CFR 219), Labor Relations Orders 87-1, 85-1, and/or individual collective bargaining agreements.

C. Testing of Transit Employees Under FTA Regulations

1. General Notice, Authority to Test

Employees in certain Safety-Sensitive Positions in all Divisions other than the RRD are subject to drug and alcohol testing under 49 CFR Part 655.

2. FTA-Covered Employees

Employees are covered under FTA regulations if they have jobs in the following categories:

- a) Operating a revenue service vehicle, including when not in revenue service;

Operating a non-revenue service vehicle, when required to be operated by a holder of a Commercial Driver's License;

- c) Controlling dispatch or movement of a revenue service vehicle;

- d) Maintaining a revenue service vehicle or equipment used in revenue service; or

- e) Carrying a firearm for security purposes. SEPTA, in its sole discretion, shall determine which positions fall under these categories. The current list of covered positions is provided in Appendix C. SEPTA will revise this list from time to time, as needed. SEPTA will inform the Advisory Committee of any additions to the list of covered positions.

3. Substances Tested For

Employees subject to testing under this Part will be tested for the HHS drug panel plus breath alcohol.

¹ Employees covered under FMCSA regulations are currently tested under the FTA testing program. See 49 CFR §382.103(d)(1).

4. Types of Drug and Alcohol Tests

FTA requires the following types of tests:

a) **Pre-employment**

Pre-employment/pre-placement (including transfer to a safety-sensitive position within the organization) and all employees who have not been in the random selection pool AND have not performed safety sensitive work in the previous 90 days will be subject to drug and alcohol testing All employees who have not been in the random selection pool AND have not performed safety sensitive work in the previous 90 days will be subject to drug and alcohol testing.

All applicants for safety-sensitive positions shall be tested for drugs. All employees seeking to transfer from a non-safety-sensitive position to a safety-sensitive position shall be tested for drugs and alcohol. All safety-sensitive employees whose individual status changes, or who are reclassified (i.e. leave of absence, out or temporarily reassigned due to injury or illness), shall be subject to drug and alcohol testing prior to performing a safety-sensitive function. If an applicant's or employee's drug or alcohol test is canceled, SEPTA shall require the employee or applicant to take another drug or alcohol test.

b) **Reasonable Suspicion**

SEPTA shall conduct drug and alcohol tests based on Reasonable Suspicion.

c) **Random**

All Covered Employees are subject to random testing for drugs and alcohol. Random testing will be conducted according to the Random Selection Testing Procedures. The current list of covered positions is attached as Appendix C.

d) **Post-accident**

(1) SEPTA will test Covered Employees operating a transit vehicle following an accident in which:

(a) An individual suffers a fatal injury;

(b) Unless the employer determines, using the best information available at the time of the decision that the covered employee's performance can be completely discounted as a contributing factor to a non-fatal accident, the covered

employee operating the vehicle shall be tested following a non-fatal accident under the following circumstances:

- An individual suffers a bodily injury and immediately receives medical treatment away from the scene of the accident.
 - When any one or more vehicles receive disabling damage. With respect to an occurrence in which the mass transit vehicle involved is a bus, electric bus, van, or automobile, one or more vehicles incurs disabling damage as the result of the occurrence, and is transported away from the scene by a tow truck or other vehicle. For purposes of this definition, disabling damage means damage which precludes departure of any vehicle from the scene of the occurrence in its usual manner in daylight after simple repairs. Disabling damage includes damage to vehicles that could have been operated but would have been further damaged if so operated, but does not include damage which can be remedied temporarily at the scene of the occurrence without special tools or parts, tire disablement without other damage even if no spare tire is available, or damage to headlights, taillights, turn signals, horn, or windshield wipers that makes them inoperative.
 - With respect to an occurrence in which the mass transit vehicle involved is a rail car, trolley car, or trolley bus, the mass transit vehicle is removed from revenue service.
- (2) In addition to covered employees actually operating the vehicle at the time of the accident, other covered employees whose actions may have contributed to the accident, such as, but not limited to mechanics, are subject to post accident testing.
- (3) Following any such accident, employees subject to testing are required to abstain from consuming any alcoholic beverages for eight hours, or until tested, whichever occurs first. Every attempt will be made to complete a breath test within two (2) hours of the

accident; if the breath test cannot be completed within two hours, a report will be filed documenting the reason. No breath test will be taken more than eight (8) hours post-accident. Additionally, all employees subject to testing must remain available for urine drug testing for 32 hours and breath testing for 8 hours, by insuring that their usual supervisor knows of their whereabouts during that period. Post-accident testing will be delayed while the employee assists in resolution of the accident, or receives medical attention following the accident. Failure to remain available is considered a Refusal to be Submit to Testing.

e) Return to Duty Testing

SEPTA shall ensure that, before returning to duty to perform a safety-sensitive function, each Covered Employee who has refused to submit to a drug or alcohol test or has a Verified Positive Drug Test Result or Positive Alcohol Test Result:

- (1) has been evaluated by the SAP to determine whether the Covered Employee has properly followed the recommendations for action by the SAP, including participation in any rehabilitation program;
- (2) has taken a return to duty drug test with a Verified Negative Result and a return to duty alcohol test with a result indicating an alcohol concentration of less than 0.02.

If a drug or alcohol test is canceled, the employer shall require the employee to take another return to duty drug or alcohol test.

f) Follow-up Testing

SEPTA shall ensure that each Covered Employee who returns to duty after a Mandatory Referral is subject to unannounced follow-up drug and alcohol testing for sixty months. The number and frequency of such tests shall be determined by the SAP except that there shall be a minimum of six follow-up drug tests with Verified Negative Results and six alcohol tests indicating an alcohol concentration of less than 0.02 during the first twelve months after returning to duty

5. Effect of Change in FTA Regulations

SEPTA's intent is to test in compliance with applicable FTA regulations. The Drug and Alcohol Policy will be amended from time to time as amendments to the FTA regulations become effective.

6. Other Testing
FTA-Covered Employees are subject to testing under SEPTA Regulations in circumstances not covered by the FTA regulations.

D. Testing of Employees Under SEPTA Regulations

1. General Notice, Authority to Test

All employees and applicants for hire are subject to drug and alcohol testing under this Section. Each type of testing defined below identifies the employees subject to such testing. Employees who are also covered by one or more DOT regulations also will be tested under those regulations when they apply.

2. Substances Tested For

Employees subject to testing under this Part will be tested for the SEPTA drug panel defined in Appendix A and breath alcohol.

3. Types of Drug and Alcohol Tests

- a) **Pre-employment**

All applicants for employment must submit to drug and alcohol testing prior to beginning their duties. If an applicant's drug or alcohol test is canceled, SEPTA shall require the applicant to take another pre-employment drug or alcohol test.

- b) **Pre-placement**

All SEPTA Safety-Sensitive Employees whose individual status changes, or who are reclassified (i.e. leave of absence, out or temporarily reassigned due to injury or illness), shall be subject to drug and alcohol testing prior to performing a Safety-Sensitive Function.

- c) **Reasonable Suspicion**

SEPTA shall conduct drug and alcohol tests for all employees based on Reasonable Suspicion.

- d) **Transfer**

An employee transferring into a SEPTA Safety-Sensitive Position must submit to drug and alcohol testing.

- e) **Post-Accident**

- (1) An accident is any incident involving a SEPTA vehicle that causes an estimated damage of approximately

\$3500.00 or more to that vehicle or any other vehicle or death or injury to any person.

- (2) Any employee operating a SEPTA vehicle involved in an on-duty fatal accident is subject to post-accident testing.
- (3) Any employee operating a SEPTA vehicle in an on-duty non-fatal accident is subject to post-accident testing unless SEPTA determines, using the best information available at the time of the decision, that the employee's performance can be completely discounted as a contributing factor to the accident.
- (4) In addition to employees actually operating the vehicle at the time of an accident, other employees whose actions may have contributed to the accident, such as, but not limited to mechanics, are subject to post-accident testing.
- (5) Following any accident, employees subject to testing are required to abstain from consuming any alcohol for eight hours, or until tested, whichever occurs first. Additionally, all employees subject to testing must remain available for urine drug testing for 32 hours and breath testing for 8 hours, by insuring that their usual supervisor knows of their whereabouts during that period.

f) Return to Duty Testing

SEPTA shall ensure that, before returning to duty to perform a SEPTA Safety-Sensitive Function, each employee who has refused to submit to a drug or alcohol test or has a Verified Positive Drug Test Result or Positive Alcohol Test Result:

- (1) has been evaluated by SAP to determine whether the employee has properly followed the recommendations for action by the SAP, including participation in any rehabilitation program;
- (2) has taken a return to duty drug test with a Verified Negative Result and a return to duty alcohol test with a result indicating an alcohol concentration of less than 0.02.

If a drug or alcohol test is canceled, the employer shall require the employee to take another return to duty drug or alcohol test.

g) Follow-up Testing

SEPTA shall ensure that each employee who returns to duty after a Mandatory Referral is subject to unannounced follow-up drug and alcohol testing for sixty months. The number of frequency of such tests shall be determined by the SAP, except that there shall be a minimum of six follow-up drug tests with Verified Negative Results and six alcohol tests indicating an alcohol concentration of less than 0.02 during the first twelve months after returning to duty.

h) Protective Testing

- (1) SEPTA will conduct protective testing if it receives a reliable report that an employee has had an off-duty drug or alcohol-related arrest.
- (2) Protective testing shall be required when positive test results cannot be confirmed, or following tests in which there is a failure or defect in the testing procedure or chain of custody. If Tampering is the suspected cause of the defect in the testing procedure, such protective testing shall be conducted under Observed Conditions.

i) Periodic Physical Examinations

Any employee subject to periodic physical examination shall have drug and alcohol testing conducted as part of that examination.

j) Signal Violations

Employees who have been directly involved in a signal violation shall be required to submit to drug and alcohol testing.

k) Random

SEPTA Safety-Sensitive Employees are subject to random testing for drugs and alcohol. The current list of SEPTA Safety-Sensitive Positions is attached as Appendix C. Random testing will be conducted pursuant to the Random Selection Testing Procedures.

l) Other Testing

Employees are subject to drug and alcohol testing as required by law or regulation.

E. Testing and Collection Procedures

1. Compliance with 49 CFR 40

All breath tests, urine collections, and analyses will be carried out by trained technicians in accordance with, and using procedures mandated by, applicable federal regulations. All laboratories utilized for urine testing shall be certified by DHHS. FTA required alcohol testing shall be done just before, during, or just after the performance of safety-sensitive functions by the employee. Copies of these regulations are available at each work location. Highlights of these procedures are set forth below.

2. Use of Samples for Drug and Alcohol Testing Only

Breath and urine samples collected under these provisions shall only be used to test for controlled substances designated or approved for testing and shall not be used to conduct any other analysis or test unless specifically authorized by DOT agency regulations.

3. Levels of Detection

The cutoff levels for drug and alcohol Screening tests, and Confirmatory GC/MS testing, are given in Appendix B. Cutoff levels for Screening tests may differ from the cutoff levels set for GC/MS confirmation.

4. Identification

Any person being tested must provide positive, current photo-identification. Acceptable identification includes a valid state driver's license or a valid SEPTA employee identification pass. If an employee does not have such identification in his/her possession, testing will proceed only if a management employee can personally identify the employee.

5. Privacy

During urine testing for drugs, an employee will be afforded the use of a private stall, except where an employee is subject to testing under Observed Conditions, in a restroom facility used only for such testing during periods of urine sample collection. Prior to testing, the Collection Site Person shall ask the employee to remove any unnecessary outer garments such as a coat or jacket that might conceal items or substances that could be used to tamper with or adulterate the individual's specimen. The Collection Site Person shall ensure that all personal belongings such as a purse or brief case remain with the outer garments. The employee may retain his or her wallet. Upon the employee's request, the Collection Site Person shall provide the employee a receipt for any personal belongings.

6. Confirmation Testing Upon Receipt of a Positive Drug Test Result

All urine specimens identified as positive on the initial test shall be confirmed using GC/MS techniques at the cutoff levels listed in Appendix B. All confirmations shall be by quantitative analysis. Concentrations that exceed the linear region of the standard curve shall be documented in the laboratory record as "greater than the highest curve value." A positive initial test followed by a negative confirmatory test shall be deemed to yield a negative result.

7. Security of Results

In order to protect the confidentiality of tested employees, the laboratory may transmit results of drug tests to the MRO by various electronic means in a manner designed to ensure confidentiality of information. Results may not be provided verbally by telephone. The laboratory and SEPTA must ensure the security of the data transmission and limit access to any data transmission, storage and retrieval system.

8. Medical Review of Positive Drug Test Results

Any urine sample reported by the laboratory as being positive for drugs on GC/MS testing will be reviewed by the MRO. The MRO will review all available medical reports and documentation, and will interview (and examine as necessary) the subject employee. The MRO will report to the employee's supervisor a Verified Positive Drug Test Result if no legitimate medical explanation is documented. The MRO shall notify the employee of his or her right to request a sample reanalysis.

9. Request for Sample Re-Analysis

If an employee disputes positive test results, s/he may request a re-analysis of the sample, provided such a request is made to the MRO within 72 hours of original notification by the MRO of a positive result. The re-analysis is conducted on a portion of the original sample, which is maintained in storage at the laboratory. Re-analyses are performed at a different, SEPTA-specified, DHHS-certified laboratory.

The employee does not have the option to provide a separate, second sample for re-testing, and administrative and disciplinary actions based on the original test results will not be delayed pending the result of the reanalysis. If the re-analysis reveals the presence of drug(s), the original test result shall be upheld and the employee must pay for the cost of the re-analysis. If the original test result is not upheld by the reanalysis, SEPTA will pay for the cost of the re-analysis, the original test will be canceled and SEPTA will investigate the reason for the discrepancy in results.

10. Monitoring for Tampering

If the employee is suspected by a Collection Site Person of Tampering with a urine sample, a second sample will be collected

under Observed Conditions. Both the suspected tampered sample and the observed sample will be forwarded to the laboratory for testing and all future specimens will be collected under Observed Conditions. Even if both samples are negative for drugs, Tampering is a dischargeable offense.

The temperature of the specimen and other observations are made by the Collection Site Person when the sample is collected. Validity tests (measures of specific gravity and other chemical tests) are made by the laboratory on all urine samples to check for Tampering. If the employee is suspected of Tampering by the MRO (upon review of laboratory reports), all future tests for that employee will be under Observed Conditions.

11. Negative Dilute Result

Following a negative dilute result, the donor will be required to undergo another test. Should this second test result in a negative dilute result, the test will be considered a negative test and no additional testing will be required unless directed to do so by the MRO.

12. Chain of Custody

Chain of Custody procedures are governed by 49 C.F.R. § 40.

13. Urine Specimen Storage.

Positive urine specimens will be kept in long-term frozen storage for at least one (1) year, after which it may be discarded if there has been no request to retain it longer by the Authority and there is no known legal challenge (in which case it shall be retained indefinitely).

14. Test Record Storage.

The laboratory shall maintain employee test records in confidence, as provided in DOT regulations, and shall disclose information related to a positive test of an individual to the individual, the employer, or the decision-maker in a lawsuit, grievance, or other proceeding initiated by or on behalf of the individual and arising from a verified-positive drug test.

15. Employee Review of Records.

The Authority shall promptly provide to an employee, upon written request, copies of any records pertaining to the employee's use of prohibited drugs, including any records pertaining to his or her drug tests.

16. Shy Bladder.

The employee must provide a urine specimen as promptly as possible within three (3) hours of arrival at the testing site. If the employee has not provided the required amount of urine, the employee must drink up to 40 ounces of fluid, distributed reasonably

during the period of up to three hours or until the employee has provided a new urine specimen, whichever occurs first. If the employee does not provide an adequate specimen within three hours, the collection procedure shall be ended and the employee shall be referred for medical evaluation to determine if the inability to void is genuine.

IV. CONSEQUENCES OF POLICY VIOLATIONS

A. Violations of Standards of Conduct

1. Probationary Employees

Probationary employees who violate Standards of Conduct shall be discharged.

2. Non-Probationary Employees

Non-probationary employees who violate Standards of Conduct shall be disciplined as follows:

a) **Violations of Prohibitions**

(1) Any employee who engages in the unlawful manufacture, distribution, dispensing, sale, possession, or use of drugs or other unauthorized controlled substances shall be discharged.

(2) Any employee who engages in the unauthorized distribution, sale, possession, or use of alcohol in any form shall be discharged.

(3) Any employee who engages in the unauthorized distribution, dispensing, sale, manufacture, possession, or use of any illicit substances shall be discharged.

(4) Measurable Presence of Alcohol: An employee whose alcohol test indicates an alcohol level greater than or equal to 0.02 but less than 0.04 shall be removed from her/his position without pay until the next regular work shift, or for eight hours, whichever is longer, and shall be treated as a Mandatory Referral. An employee's second violation of this provision in his career shall result in discharge.²

b) **Pre-Duty Use of Alcohol**

An employee in a Safety Sensitive Position who has consumed alcohol Pre-Duty shall not be permitted to work

² Does not apply when the alcohol test was under Federal regulations.

and shall not be paid. An employee's second violation of this provision in his career shall result in a three-day suspension without pay and a Mandatory Referral. An employee's third violation of this provision in his career shall result in a five-day suspension without pay and a Mandatory Referral. An employee's fourth violation in his career shall result in discharge.

c) **On-Call Use of Alcohol**

An employee in a Safety Sensitive Position who has consumed alcohol on-call shall not be permitted to work and shall not be paid. An employee's second violation of this provision in his career shall result in a three-day suspension without pay and a Mandatory Referral. An employee's third violation of this provision in his career shall result in a five day suspension without pay and a Mandatory Referral. An employee's fourth violation in his career shall result in discharge.

d) **Failure to Disclose Drug Convictions**

An employee who fails to disclose a workplace related drug conviction shall be discharged.

e) **Failure to Disclose Use of Prescribed Medication**

A Safety-Sensitive Employee's failure to notify SEPTA s/he is taking a prescribed medication when required to so disclose will subject the employee to progressive discipline and to counseling by the SAP. If, in the opinion of the SAP, the use of undisclosed prescription medication may indicate substance abuse, the employee will receive a Mandatory Referral to the EAP.

B. Consequences of a Positive Drug or Alcohol Test Result³

1. Probationary Employees

Any Probationary employee who receives a Verified Positive Drug Test Result or Positive Alcohol Test Result in any test administered under this policy shall be discharged.

2. Employees

a) **Random**

³ The disciplinary consequences contained herein are not mandated by the FTA but are required by SEPTA Regulations

A non-probationary employee who receives a Verified Positive Drug Test Result or Positive Alcohol Test Result in a Random Test administered under this Policy shall be discharged if the employee has previously tested positive for drugs and/or alcohol in a test conducted for any reason. A non-probationary employee who receives a Verified Positive Drug Test Result or a Positive Alcohol Test in a Random Test administered under this policy and it is the employees first positive in his/her career shall be treated as a Mandatory Referral under this policy.

b) **Other Tests**

A non-probationary employee who receives a Verified Positive Drug Test Result or Positive Alcohol Test Result in any other test under this policy shall be discharged.

3. Applicants for Employment

- a) Any applicant for employment who receives a Verified Positive Drug Test Result or alcohol pre-employment test indicating an alcohol concentration of 0.02 or above shall have her/his offer of employment withdrawn. The applicant may apply again for employment after a two year waiting period, and will be subject to pre-employment drug and alcohol testing upon such re-application.
- b) As part of pre-employment drug and alcohol testing, if an applicant has had a positive test or a refusal to test, the applicant must not perform safety-sensitive functions, until and unless the applicant documents successful completion of the return-to-duty process as established by governmental regulations and/or SEPTA policy.

4. Improperly Ordered Test

Employees and probationary employees who have positive drug or alcohol test results in tests determined to be improperly ordered shall not be discharged because of the test results, but shall be treated as a Mandatory Referral.

C. Refusal to Comply with Testing

1. Refusal to Submit to Test

An employee who Refuses to Submit to any drug or alcohol test required under this Policy shall be discharged.

2. Compliance with Testing Procedures

All employees must comply with testing procedures. Refusal to comply with testing procedures is a dischargeable offense.

3. Tampering
Tampering is a dischargeable offense.

V. EDUCATION AND TREATMENT⁴

A. Drug and Alcohol Free Awareness Program

SEPTA has developed a Drug and Alcohol Free Awareness program to assist employees to understand the perils of drug and alcohol abuse. As part of this Program, SEPTA will engage in an educational effort to prevent and eliminate drug and alcohol abuse that may affect the workplace. At a minimum, each new hire, each employee, and each supervisor shall receive 60 minutes of training in:

1. SEPTA's Drug and Alcohol Free Workplace Policy;
2. The effects and dangers of drug and alcohol abuse in the workplace;
3. Recognition of the signs and symptoms of individuals who use drugs and/or alcohol;
4. The availability of treatment and counseling for employees who voluntarily seek such assistance including how to use the EAP;
5. The consequences of positive test results and other violations of the Policy.

Additionally, supervisors who may make reasonable suspicion determinations shall receive at least 60 minutes of training on the physical, behavioral, and performance indicators of probable drug use, plus 60 minutes of training on the physical, behavioral, and performance indicators of probable alcohol misuse.

B. Anti-Drug Information/Wellness Program

In addition to the EAP services offered to provide drug and alcohol treatment under the Drug-Free Workplace Policy, the Medical Department will provide educational mailings and/or distributions concerning a wide variety of lifestyle issues, including drug and alcohol abuse, to all employees and their families.

C. Employee Assistance Program

SEPTA offers its employees and their dependents an EAP to aid them in working out personal difficulties that may be affecting their personal lives, performance on the job, and possibly contributing to the misuse of alcohol or controlled substances, or exacerbating other medical illnesses or problems.

⁴ Sections B, C, and D are pursuant to SEPTA policy and are not required by the FTA.

Any employee may at any time seek confidential assistance through the EAP. Management referral or permission is not required. The EAP is staffed with fully trained mental health and substance abuse specialists who can assist with all problems of living, including but not limited to drug or alcohol use and abuse.

D. Outside EAP Provider

To ensure confidentiality and make employees more comfortable using the EAP, SEPTA contracts with an outside service company to provide the EAP. The current provider and its telephone numbers are noted in Appendix D. Should the provider change, SEPTA will advise all employees of the new provider by direct household mailings or work location postings. Additionally, any supervisor can provide employees with the EAP number. The EAP maintains a 24-hour hotline, as noted in Appendix D.

Under SEPTA's Drug-Free Workplace Policy, employees may receive Mandatory Referrals to the EAP. Since such Mandatory Referrals are initiated by SEPTA, SEPTA is aware of the circumstances involved. In such cases, the EAP will share sufficient information with SEPTA to determine when an employee who has tested positive is ready to return to work. The EAP will disclose the progress of an employee to SEPTA staff other than the SAP only if obligated to do so under its duty to warn SEPTA that an employee who is not cleared for safety-sensitive work may attempt to return to such work.

Aside from fulfilling such obligation, the EAP will maintain the confidentiality of employees who utilize its services, including drug and alcohol rehabilitation and treatment services.

E. Resources For Assistance⁵

1. The EAP's Preferred Provider Network

The EAP provider maintains a listing of hospital, clinic, and treatment resources with which it works closely. The current Preferred Provider Organization (PPO) is noted in Appendix D. In a non-emergency situation, employees should call the EAP first, as the EAP staff is trained to do a complete evaluation, thereby providing the most accurate and best referral for professional assistance. In an emergency, if an employee feels that even a slight delay in receiving assistance might be harmful, the employee should utilize the emergency services available through his/her health plan. Of course, in a life threatening medical or psychiatric emergency, an employee should call "911," or go directly to the nearest hospital emergency room.

⁵ Parts 1-3 and 5 are pursuant to SEPTA policy and are not required by the FTA.

2. The Community Mental Health System

In addition to the EAP and its PPO, local city and county governments maintain a system of community mental health centers. These centers are divided along "catchment areas," so the location of an employee's home determines which center would provide services. The telephone numbers for the local community mental health centers are listed in the "blue pages" of the telephone book.

3. Payment for EAP Referrals

Payment for EAP referrals is in accordance with the provisions of the employee's health plan.

4. Mandatory Referrals

a) **Entry into Mandatory Treatment**

The employee must contact the Authority's SAP within 72 hours of referral. S/he must comply with any treatment the SAP counselor recommends, and return to work within 90 days of referral.

b) **Release from Mandatory Treatment**

When the employee is released from any prescribed treatment, s/he must contact the SAP within 72 hours to schedule a post-treatment evaluation, and at that evaluation, present for review a letter from the treatment provider certifying that s/he has complied with treatment, agrees to any recommended after-care, and is able to return to duty without restriction. As part of the post-treatment evaluation, the employee will be tested for drugs and alcohol.

c) **Compensation During Participation in Mandatory Treatment**

During the time s/he is held off by the EAP for evaluation and treatment, s/he may draw sick benefits in accordance with applicable policies. S/he must complete any papers or forms required for starting sick benefits and return them to the Benefits Department for processing in order to receive such pay.

d) **Mandatory Follow-up Testing Guidelines**

Employees subject to mandatory follow-up testing must comply with the following rules:

- (1) The employee must comply with the follow-up post-treatment, and return to duty testing procedures defined in Part III. The employee may not place him/herself in the sick book after being notified of a test.
- (2) The employee must meet with the SAP for monitoring and counseling appointments, if scheduled by the SAP. The employee may also call the SAP at any time to set up an appointment if s/he desires.
- (3) If the employee desires treatment or assistance, s/he may request it by calling the EAP or the SAP. However, if the employee requests assistance or treatment after s/he has been notified of selection for any test, asking for assistance will not block the test from occurring, and s/he must still submit to testing. Asking for assistance after being notified of a test will not alter the administrative or disciplinary consequences of such testing if those test results are positive.
- (4) The employee is referred for education and/or a level of treatment based on the self-reported pattern of use. As a condition of continued employment, the employee must comply with, and complete, the treatment plan and any aftercare recommended by the treatment provider and approved by the SAP. During the aftercare phase of treatment, the employee may be permitted to return to work upon clearance by the SAP, but remains obligated to complete this phase and be monitored by the SAP. If the employee is determined by the SAP to be non-compliant with the program, s/he shall be counseled, on a one-time basis, about the consequence of noncompliance. Further noncompliance shall result in the employee being discharged.
- (5) Participation in follow-up testing or any aspect of any employee assistance program does not alter or prevent appropriate administrative or disciplinary action for any violation of Authority rules and regulations.
- (6) The follow-up monitoring period will commence when the employee reports for duty.
- (7) If, at the post-treatment evaluation, the employee has any doubt about whether s/he is ready to return to work, or has any doubt about whether s/he would pass the drug and alcohol test or if s/he feels that additional

treatment or assistance is needed before returning to work, the evaluation may be ended without a test, and the employee may report back to the SAP without penalty provided s/he has not exceeded the 90-day maximum time for mandatory treatment.

5. Voluntary Referrals to the EAP

Non-probationary employees who are not subject to Mandatory Referral to the SAP may choose to utilize EAP drug and alcohol rehabilitation services of their own volition. SEPTA encourages this use. However, if the employee requests assistance or treatment after she/he has been notified of selection for any test, asking for the assistance will not block the test from occurring and she/he must still submit to the testing. Asking for assistance after being notified of a test will not alter the administrative or disciplinary consequences of such testing. Moreover, the employee shall not avoid any disciplinary charges or pending disciplinary charges by entering voluntary referral.

The EAP will disclose the progress of an employee who voluntarily refers her/himself to SEPTA staff only if obligated to do so under its duty to warn SEPTA that an employee who is not cleared for Safety-Sensitive work may attempt to return to such work.

Aside from fulfilling such obligation, the EAP will maintain the confidentiality of employees who utilize its services, including drug and alcohol rehabilitation and treatment services.

VI. CONFIDENTIALITY

The results of an employee's drug and alcohol test results, and the fact of and circumstances relating to an employee's participation in the EAP, will be treated as confidential medical information and maintained in complete confidence in the Medical Department. Within the Medical Department itself, such information will be disclosed only to the Medical Director, the MRO, the SAP, the laboratory manager, and such other personnel as have a need to know. Statistical compilations, not identifying the individuals in question, may be made of testing and EAP data and be provided to the public and/or government regulators.

SEPTA will not voluntarily disclose the results of drug and alcohol tests to law enforcement agencies or government officials. However, when required by law, SEPTA will comply with disclosure requirements.

In the event that an employee, or any Union or other representative of that employee, makes disclosure of test results or EAP participation or challenges test results or administrative or disciplinary action related to this policy, disclosure of relevant information may be made by SEPTA to the extent necessary to defend itself and to protect its and the public's interest.

VII. ONGOING REVIEW

It is the responsibility of the Responsible Officials designated in this Policy to monitor and evaluate the implementation of this Policy and to make such amendments as may be necessary from time to time to carry out its purposes.

The Responsible Officials or their designees will inform the Advisory Committee semi-annually of:

- positions added to the lists of Safety-Sensitive Positions;
- substantive changes in the Policy; and
- changes in the EAP provider or the testing laboratory.

VIII. SEPARABILITY CLAUSE

A. Effect of Court Rulings

If any part or section of this Policy is held invalid by any court of last resort or by any regulatory commission or agency with jurisdiction, or if compliance with or enforcement of any part or section shall be restrained by such tribunal pending final determination as to its validity, the remainder of this Policy shall not be affected thereby.

B. Effect of Legislation

This policy is subject to all applicable laws now or hereinafter in effect, and to the lawful regulations, rulings and orders of regulatory commissions or agencies having jurisdiction. If any part or section of this Policy is in contravention of the laws or regulations of the United States or the Commonwealth of Pennsylvania, such part or section shall be superseded by the appropriate provision of such law or regulation, but all other parts and sections of this Policy shall continue in full force and effect.

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APPENDIX A

Drug Test Panels

DHHS Panel

- Marijuana and its by-products and metabolites, including delta-9-THC;
- Cocaine and its by-products and metabolites;
- Opiates and its by-products and metabolites, including 6-acetylmorphine, morphine, codeine, and heroin;
- Amphetamine and its by-products and metabolites including MDMA, MDA, and MDEA;
- Phencyclidine and its by-products and metabolites

SEPTA Panel

The SEPTA Drug Panel consists of the DHHS Drug Panel plus:

- Barbiturates (such as phenobarbital, butalbital);
- Benzodiazepines (such as Valium, Serax, Tranxene);
- Methadone;
- Propoxyphene; and
- Alternative drugs of abuse, as determined by findings in the community.

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APPENDIX B

Levels of Detection

Breath alcohol levels are expressed as Breath Alcohol Concentration (BAC), as measured by the test equipment in the Collection Site. If any measurable level of alcohol is found on a preliminary test, the action is for employee to be removed from safety-sensitive work, and if the level is 0.02 or greater, for a confirmatory test to be done. If the confirmatory test result equals or exceeds 0.04, the test is reported as positive. The following are the levels of detection, expressed in nanograms, for substances in the current urine test panels. If a screening test result equals or exceeds the cutoff level shown, the laboratory's automatic action is to perform a confirmatory test. If the confirmatory test result equals or exceeds the cutoff level shown, the test is reported as positive by the laboratory. These levels may change from time to time.

Substance	Screening Cutoff (ng/mL)		Confirmatory Cutoff (ng/mL)	
	DHHS	SEPTA	DHHS	SEPTA
Marijuana Metabolites	50	50		
Delta-9-THC			15	15
Cocaine Metabolites	150	150		
Benzoylecgonine			100	100
Opiate Metabolites	2000	2000		
Morphine			2000	2000
Codeine			2000	2000
6-acetylmorphine	10	10	10	10
Phencyclidine	25	25	25	25
Amphetamines	500	500		
Amphetamine			250	250
Methamphetamine			250	250
MDMA/MDA/MDEA	500	500	250	250
Barbiturates		300		200
Benzodiazepines		300		200
Methadone		300		300
Propoxyphene		300		300

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APPENDIX C

All SEPTA Jobs Subject to Random Testing

FRA CATEGORIES 1 = Engine Service - RRD 4 = Signal Service - RRD

2 = Train Service - RRD 5 = Other - RRD (Yrdmstr, Hstlr)

3 = Dispatcher/Operator - RRD

FTA CATEGORIES 11 = Revenue Vehicle Operation (in or out of service)

12 = CDL Holder operating non-revenue vehicle

13 = Dispatch/Control movement of revenue vehicle

14 = Maintain revenue vehicle or equipment

15 = Armed security

SEPTA 21 = Supervisors 24 = Safety & Training

CATEGORIES 22 = Drug Testing Program 25 = Revenue/Collection

23 = Admin/Chain of Command 26 = Other Safety-Sensitive

Payroll Type	Job Number	RDT Code	RDT Category	Job Title
P11M 0007	15	FTA		TRANSIT POLICE OFFICER
P21M 0007	15	FTA		TRANSIT POLICE OFFICER
P21M 0085	11	FTA		CLEANER D

P31M	0102	14	FTA	MECHANIC 2ND CLASS
P21M	0120	11	FTA	CLEANER D
P21M	0148	11	FTA	CLEANER D
P32T	0201	13	FTA	STARTER
P21M	0286	26	SEPTA	TOW MOTOR OPER D 07
P31M	0346	14	FTA	SIGNAL MNT 1ST CL SP AA
P21M	0501	14	FTA	OVERHAULR & BDY REBUILD-1ST
P21M	0502	14	FTA	LOOP CLEANER PORTER D
P21M	0521	14	FTA	MACHINIST-FIRST CL
P21M	0522	14	FTA	MACHINIST-2ND CL
P21M	0551	14	FTA	MECHANICAL REPAIRER FIRST CLASS
P21M	0552	14	FTA	MECHANICAL REPAIRER - SECOND CLASS
P21M	0561	14	FTA	SHEET METAL FABRICATOR - 1ST CLASS
P21M	0600	14	FTA	TRANSMISSION REPAIR SPECIALIST
P21M	0601	14	FTA	VEH EQUIP MECH-1ST CL
P31M	0601	14	FTA	VEH & EQUIP MECH 1ST CL
P21M	0602	14	FTA	VEH EQUIP MECH-2ND CL
P31M	0602	14	FTA	VEH & EQUIP MECH 2ND CL
P21M	0603	14	FTA	VEH EQUIP MECH-3RD CL
P31M	0603	14	FTA	VEH & EQUIP MECH 3RD CL
P21M	0604	14	FTA	VEH EQUIP-GEN HELPER
P31M	0604	14	FTA	VEH & EQUIP GENERAL HELPER
P21M	0610	14	FTA	VEH EQ MAINT-SPECIALIST
P21M	0611	14	FTA	VEH EQ MAINT-1ST CL
P21M	0612	14	FTA	VEH EQ MAINT-2ND CL

P21M	0620	14	FTA	HVAC AUTOMOTIVE EQUIP SPECIALIST
P31M	0620	14	FTA	HVAC AUTOMOTIVE EQUIP SPECIALIST
P41M	0620	14	FTA	HVAC AUTOMOTIVE EQUIP SPECIALIST
P21M	0621	14	FTA	VEH EQ BODY/MECHANIC
P31M	0621	14	FTA	VEH & EQUIP BODY MECH 1ST CL
P41M	0621	14	FTA	VEH EQ BODY/MECHANIC
P21M	0710	26	SEPTA	TRACTION-POWER SUBSTATION MAINTAINER SPC
P31M	0710	26	SEPTA	SUBSTATION MAINTAINER - SPECIALIST
P61M	0710	26	SEPTA	SUBSTATION MAINTAINER - SPECIALIST
P21M	0711	26	SEPTA	TRACTION-POWER SUBSTA MAINT. 1ST CL
P31M	0711	26	SEPTA	TRACTION-POWER SUBSTA MAINT. 1ST CL
P61M	0711	26	SEPTA	SUBSTATION MAINTAINER 1ST CLASS
P21M	0712	26	SEPTA	TRACTION-POWER SUBSTA MAINT 2ND CL
P61M	0712	26	SEPTA	SUBSTATION MAINTAINER - 2ND CLASS
P21M	0713	26	SEPTA	SUBSTATION MAINT TRAINEE
P61M	0713	26	SEPTA	SUBSTATION MAINTAINER - 3RD CLASS
P21M	0722	26	SEPTA	SUBSTATION OPERATOR-2ND CL
P21M	0731	12	FTA	OVERHEAD MAINTNR.-FIRST CL
P31M	0731	12	FTA	LINE REPAIRER/ELECTRICIAN 1ST CL
P61M	0731	12	FTA	OVERHEAD MAINT. - 1ST CLASS
P21M	0732	12	FTA	OVERHEAD MAINTNR-2ND CL
P31M	0732	12	FTA	LINE REPAIRER/ELECTRICIAN 2ND CL
P61M	0732	12	FTA	OVERHEAD MAINTAINER-2ND CLASS
P21M	0733	12	FTA	OVERHEAD MAINTNR-3RD CL
P61M	0733	12	FTA	OVERHEAD MAINT. - 3RD CLASS

P21M	0734	26	SEPTA	OVERHEAD GENL HELPER
P61M	0734	26	SEPTA	POWER TRAINEE
P21M	0735	12	FTA	OVERHEAD MAINTNR-TRAINEE
P21M	0740	26	SEPTA	ASBESTOS ABATEMENT SPECIALIST
P61M	0740	26	SEPTA	HIGH VOLTAGE ELECTRICIAN SPECIALIST
P21M	0741	26	SEPTA	UNDERGROUND MAINTNR-FIRST CL
P61M	0741	26	SEPTA	ELECTRICIAN - FIRST CLASS
P21M	0742	26	SEPTA	UNDERGROUND MAINTNR-2ND CL
P21M	0743	26	SEPTA	UNDERGROUND MAINTNR-3RD CL
P21M	0744	26	SEPTA	UNDERGROUND GENL HELPER
P21M	0745	26	SEPTA	UNDERGROUND MAINTNR-TRAINEE
P21M	0750	26	SEPTA	ELECTRICAL/ELECTRONIC SPECIALIST
P21M	0751	26	SEPTA	ELECTRICIAN-FIRST CLASS
P31M	0751	26	SEPTA	ELECTRICIAN-FIRST CLASS
P61M	0751	26	SEPTA	ELECTRICIAN - 1ST CLASS
P21M	0752	26	SEPTA	ELECTRICIAN-SECOND CLASS
P61M	0752	26	SEPTA	ELECTRICIAN-SECOND CLASS
P21M	0760	14	FTA	RAILWY SIG SYS MAINT SPEC
P31M	0760	14	FTA	SIGNALS MAINTAINER SPECIALIST
P61M	0760	04	FRA	RAILWY SIG & COM SYS MNTR SPEC
P21M	0761	14	FTA	RAILWY SIG SYS MAINT 1ST CL
P61M	0761	04	FRA	RAILWAY SIG SYS MNTR-1ST
P21M	0762	14	FTA	SIGNAL MAINTAINER FIELD SPECIALIST
P21M	0763	14	FTA	SIGNAL SHOP TECHNICIAN
P21M	0765	14	FTA	SIGNALS TRAINEE

P31M	0765	14	FTA	SIGNALS TRAINEE
P61M	0765	14	FTA	RAILWAY SIGNAL SYSTEM TRAINEE
P61M	0766	04	FRA	RAILWAY SIG SYS INSPECTOR
P21M	0767	14	FTA	RAILWAY SIGNAL SYSTEM TRAINEE HELPER
P61M	0767	14	FTA	RAILWAY SIGNAL SYSTEM TRAINEE HELPER
P21M	0771	26	SEPTA	UTILITY VEHICLE EQUIP MECH-1ST
P61M	0791	26	SEPTA	TRACTION POWER MAIN 1ST CLASS
P61M	0792	26	SEPTA	TRACTION POWER MAINT 2ND CLASS
P21M	0800	14	FTA	RV & EQUIP BODY-WELDER-SPEC
P61M	0800	14	FTA	RV & EQUIP BODY-WELDER-SPEC
P21M	0801	14	FTA	RV & EQUIP BODY/MECH 1ST
P61M	0801	14	FTA	RV & EQUIP BODY MECH 1ST CLASS
P21M	0802	14	FTA	RV & EQUIP BODY/MECH-2ND
P61M	0802	14	FTA	RV & EQUIP BODY MECH 2ND CLASS
P21M	0803	14	FTA	RAIL VEH EQUIP CAR WELDER/COLLISIONSPEC
P21M	0811	14	FTA	R. V. MACHINIST-FIRST CLASS
P31M	0811	14	FTA	RAIL VEHICLE MACHINIST 1ST CL
P61M	0811	14	FTA	R.V. MACHINIST 1ST CLASS
P21M	0812	14	FTA	R. V. MACHINIST - SECOND CLASS
P61M	0812	14	FTA	R. V. MACHINIST - 2ND CLASS
P21M	0820	14	FTA	ARMATURE WINDER SPECIALIST
P21M	0821	14	FTA	ARMATURE WINDER-FIRST CLASS
P61M	0830	26	SEPTA	RAIL VEHICLE MECHANICAL SPECIALIST
P21M	0831	14	FTA	RV & EQUIP GEN MECH-1ST
P31M	0831	14	FTA	RV & EQUIP GEN MECH-1ST

P61M	0831	14	FTA	RV & EQUIP GEN MECH 1ST CLASS
P21M	0832	14	FTA	RV & EQUIP GEN MECH-2ND
P31M	0832	14	FTA	RV & EQUIP GEN MECH-2ND
P61M	0832	14	FTA	RV & EQUIP GEN MECH 2ND CLASS
P21M	0833	14	FTA	RV & EQUIP GEN MECH-3RD
P31M	0833	14	FTA	RV & EQUIP GEN MECH
P61M	0833	14	FTA	RV & EQUIP GEN MECH 3RD CLASS
P61M	0834	26	SEPTA	RAIL VEH MECHANICAL GEN HELPER
P61M	0835	26	SEPTA	RAIL MECHANICAL APPRENTICE
P21M	0840	14	FTA	RV ELECTRONIC SPECIALIST
P31M	0840	14	FTA	RV ELECTRONIC SPECIALIST
P61M	0840	14	FTA	R.V. ELECTRONIC SPECIALIST
P61M	0841	26	SEPTA	RV ELEC/ELECTRONIC MNTR 1ST CLASS
P21M	0841	14	FTA	RV ELEC/ELECTRONIC MNTR-1ST
P31M	0841	14	FTA	RV ELEC/ELECTRONIC MNTR-1ST
P21M	0842	14	FTA	RV ELEC/ELECTRONIC MNTR-2ND
P61M	0842	14	FTA	RV ELEC/ELECTRONIC MNTR 2ND CLASS
P21M	0843	14	FTA	RV ELECTRONIC TECHNICIAN
P61M	0844	26	SEPTA	RAIL VEHICLE ELECTRICAL GENERAL HELPER
P61M	0845	26	SEPTA	ELECTRICAL GENERAL INTERN
P21M	0850	14	FTA	RL. VEH. HVAC SPECIALIST
P31M	0850	14	FTA	RV HVAC SPECIALIST
P61M	0850	14	FTA	R.V.- HVAC SPECIALIST
P21M	0851	14	FTA	RAIL VEHICLE & EQUIP WELDER - 1ST CL
P61M	0851	14	FTA	R.V. & EQUIP. WELDER 1ST CLASS

P21M	0852	14	FTA	RAIL VEHICLE & MAINT 2ND CL
P61M	0852	14	FTA	R.V. HVAC MAINTAINER 2ND CLASS
P21M	0871	14	FTA	WELDER - FIRST CLASS
P21M	0880	14	FTA	INDUCTION EQUIP REPAIR MTCE SPECIALIST
P21M	0881	14	FTA	INDUCTION EQUIP REPAIR MTCE FIRST CL
P21M	0882	14	FTA	INDUCTION EQUIP REPAIR MTCE SECOND CL
P21M	0903	11	FTA	MAINTENANCE CUSTODIAN/DRIVER
P31M	0903	11	FTA	MAINTENANCE CUSTODIAN/DRIVER
P61M	0903	11	FTA	MAINTENANCE CUST/DRIVER
P21M	0940	11	FTA	CLEANER D
P21M	0941	11	FTA	CLEANER D
P41M	0990	14	FTA	HELPER
P21M	0991	14	FTA	MECHANIC 1ST CLASS
P41M	0991	14	FTA	MECHANIC 1ST CLASS
P21M	0992	14	FTA	MECHANIC 2ND CLASS
P41M	0992	14	FTA	MECHANIC 2ND CLASS
P21M	0993	14	FTA	MECHANIC - 3RD CLASS
P41M	0993	14	FTA	MECHANIC - 3RD CLASS
P21M	0994	11	FTA	GENERAL HELPER
P41M	0994	11	FTA	HELPER
P21M	0995	11	FTA	MAINTENANCE CUSTODIAN/DRIVER
P41M	0995	11	FTA	MAINT CUST/DRIVER-FRONTIER
P41M	0996	11	FTA	MAINTENANCE CUSTODIAN-FRONTIER
PSAM	1014	26	SEPTA	SR PROJ ENGINEER (OPS SUPP)
PSAM	1015	26	SEPTA	PROJECT ENGINEER (OPS SUPP)

PSAM	1016	26	SEPTA	ENGINEER II (OPS SUPP)
PSAM	1017	26	SEPTA	SR PROJECT ENGINEER (E&C)
PSAM	1020	26	SEPTA	SR FIELD ENGINEER (E&C)
P21M	1101	12	FTA	PLUMBER-FIRST CLASS
P31M	1101	12	FTA	PLUMBER-FIRST CLASS
P61M	1101	12	FTA	PLUMBER-FIRST CLASS
P21M	1102	12	FTA	PLUMBER-SECOND CLASS
P21M	1151	12	FTA	BLDGS MILLWRIGHT-FIRST CL
P31M	1151	12	FTA	MILLWRIGHT-1ST CL
P41M	1151	12	FTA	MILLWRIGHT-1ST CL
P61M	1151	12	FTA	BLDGS MILLWRIGHT-1ST CLASS
P21M	1152	12	FTA	BLDGS MILLWRIGHT-SECOND CL
P61M	1160	12	FTA	BLDGS STRUC WELDER SPECIALIST
P21M	1161	26	SEPTA	BLDGS STRUC WELDER-1ST
P31M	1161	26	SEPTA	STRUCTURAL WELDER 1ST CL
P61M	1161	26	SEPTA	BLDGS STRUC WELDER 1ST CLASS
P21M	1162	26	SEPTA	BLDGS STRUCTURAL WELDER-2ND CL
P21M	1174	12	FTA	BUILDINGS GENERAL HELPER
P31M	1174	12	FTA	BUILDINGS GENERAL HELPER
P61M	1174	12	FTA	BUILDINGS GENERAL HELPER
P21M	1201	14	FTA	TRACK INSPECTOR/MAINTAINER 1ST CL
P31M	1201	14	FTA	TRACK INSPECTOR/MAINTAINER 1ST CL
P61M	1201	14	FTA	TRACK INSPECTOR/MAINTAINER 1ST CL
P21M	1202	14	FTA	TRACK MAINTAINER-2ND CL
P31M	1202	14	FTA	TRACK MAINTAINER-2ND CL

P61M	1202	14	FTA	TRACK MAINTAINER 2ND CLASS
P21M	1203	14	FTA	TRACK MAINTAINER-3RD CL
P21M	1211	14	FTA	MACHINIST-FIRST CL
P21M	1221	14	FTA	RAIL MAINTAINER 1ST CL
P31M	1221	14	FTA	RAIL MAINTAINER 1ST CL
P61M	1221	14	FTA	RAIL MAINTAINER 1ST CLASS
P21M	1222	14	FTA	RAIL MAINTAINER-2ND CL
P31M	1222	14	FTA	RAIL MAINTAINER 2ND CL
P61M	1222	14	FTA	RAIL MAINTAINER 2ND CLASS
P21M	1223	14	FTA	RAIL MAINTNR-3RD CL
P21M	1240	26	SEPTA	EQUIP REPAIRER-SPECIALIST
P31M	1240	26	SEPTA	EQUIP REPAIRER-SPECIALIST
P61M	1240	26	SEPTA	EQUIP REPAIRER - SPECIALIST
P21M	1241	26	SEPTA	EQUIP REPAIRER-1ST CL
P31M	1241	26	SEPTA	EQUIPMENT REPAIRER 1ST
P61M	1241	26	SEPTA	EQUIP REPAIRER - 1ST CLASS
P21M	1251	26	SEPTA	TRACK EQUIPMENT OPERATOR - 1ST CL
P61M	1251	26	SEPTA	TRACK EQUIP OPEARATOR - 1ST CLASS
P21M	1252	26	SEPTA	TRACK EQUIPMT OPTR-2ND CL
P61M	1252	26	SEPTA	TRACK EQUIP OPERATOR - 2ND CLASS
P21M	1253	26	SEPTA	TRACK EQUIPMT OPTR-3RD CL
P61M	1253	26	SEPTA	TRACK EQUIP OPERATOR 3RD CLASS
P21M	1261	12	FTA	CONSTRUCTION EQUIP OPTR-1ST CL
P61M	1261	12	FTA	CONSTRUCTION EQUIP OP 1ST CLASS
P21M	1262	12	FTA	CONSTRUCTION EQUIP OPTR-2ND CL

P31M	1262	12	FTA	CONSTRUCTION EQUIPMENT OP -2ND CL
P61M	1262	12	FTA	CONSTRUCTION EQUIP OP 2ND CLASS
P21M	1263	12	FTA	CONSTRUCTION EQUIP OPTR-3RD CL
P61M	1263	12	FTA	CONSTRUC EQUIP OPERATOR 3RD CLASS
P31M	1271	12	FTA	EQUIPMENT OPERATOR 1ST CL
P61M	1273	26	SEPTA	FLAGMAN/TRACK GENERAL HELPER
P21M	1274	14	FTA	TRACK GENERAL HELPER
P31M	1274	14	FTA	TRACK GENERAL HELPER
P61M	1274	14	FTA	TRACK GENERAL HELPER
PSAM	2003	21	SEPTA	ASST DIR OF MAINTENANCE
PSAM	2010	21	SEPTA	MAINTENANCE MANAGER
PSAM	2011	21	SEPTA	MGR VEH EQUIP & REBUILT UNIT
PSAM	2020	23	SEPTA	DIRECTOR OF MAINTENANCE
PSAM	2076	23	SEPTA	SUPV COLL EQUIP & CONTROL
PSAM	2094	13	FTA	TRANSPORTATION MANAGER
PSAM	2095	13	FTA	RR SERVICE MANAGER
P22T	2100	11	FTA	SURFACE TRAIN OPERATOR
P32T	2100	11	FTA	SURFACE TRAIN OPERATOR
P32T	2102	11	FTA	CONDUCTOR
PSAM	2110	21	SEPTA	DIR STATION OPERATIONS
P22T	2200	11	FTA	BUS OPERATOR
P32T	2200	11	FTA	BUS OPERATOR
P42T	2200	11	FTA	BUS OPERATOR
P21M	2204	11	FTA	VEHICLE READINESS COORDINATOR
P31M	2204	11	FTA	VEHICLE READINESS COORDINATOR

P41M	2204	11	FTA	VEHICLE READINESS COORDINATOR
P32T	2206	11	FTA	TEMPORARY OPERATOR
P22T	2208	11	FTA	PART-TIME OPERATOR
P32T	2208	11	FTA	PART TIME OPERATOR
P42T	2208	11	FTA	PART TIME OPERATOR
P22T	2209	11	FTA	BUS OPERATOR (FT) - TPC
P22T	2210	11	FTA	BUS OPERATOR (PT) - TPC
P22T	2211	11	FTA	PARATRANSIT OPERATOR-TPC(FT)
P22T	2212	11	FTA	PARATRANSIT OPERATOR-TPC(PT)
P22T	2300	11	FTA	SUB-EL TRAIN OPERATOR
P32T	2300	11	FTA	TRAIN OPERATOR
P22T	2301	13	FTA	TOWER OPERATOR
P21M	2302	11	FTA	YARD MOTOR OPERATOR
P22T	2305	13	FTA	STATION ASSISTANT
P22T	2400	11	FTA	OPERATOR-F.C.R.T.
P62T	2533	02	FRA	CONDUCTOR
P62T	2534	01	FRA	ENGINEER
P62T	2535	02	FRA	ASSISTANT CONDUCTOR
P61M	2542	04	FRA	TOWER OPERATOR
P63B	2543	04	FRA	ASSISTANT TOWER OPERATOR
P62T	2556	01	FRA	CONDUCTOR/ENGINEER TRAINEE
P61M	2560	04	FRA	COMM MAINTAINER SPECIALIST
P61M	2561	04	FRA	COMM MAINTAINER 1ST CLASS
P61M	2565	04	FRA	RAILWY SIG SYS TRNEF
P61M	2604	26	SEPTA	UTILITY EQUIP GENL HELPER

PSAM	4001	13	FTA	TRAIN DISPATCHER
PSAM	4003	26	SEPTA	POWER DISPATCHER-RRD
PSAM	4004	13	FTA	DISPATCHER/MONITOR-CCT
PSAM	4006	23	SEPTA	ASST DIR TRANSPORTATION
PSAM	4012	23	SEPTA	DEP DIR OF TRANSPORTATION
PSAM	4023	23	SEPTA	REVENUE/QUALITY CONTROL
PSAM	4028	23	SEPTA	ASST DIR STATION OPERATIONS
PSAM	4029	23	SEPTA	STATION MANAGER
PSAM	4030	13	FTA	CONTROL CENTER MGR-BUS
PSAM	4031	13	FTA	CONTROL CENTER MGR-RAIL
PSAM	4032	13	FTA	CONTROL CENTER MGR-SUB EL
PSAM	4033	03	FRA	CONTROL CENTER MGR-RR
PSAM	5072	26	SEPTA	SECURITY EQUIPMENT SPECIALIST
PSAM	5097	15	FTA	TRANSIT POLICE TRAIN SPEC
PSAM	5131	26	SEPTA	FIELD SERVICE OFFICER
P23B	5733	26	SEPTA	INSTRUMENT TECHNICIAN
P23B	5734	26	SEPTA	ELECTRONIC/ELECTRICAL LAB TECH
P23B	5736	26	SEPTA	SENIOR INSTRUMENT TECHNICIAN
P23B	5738	26	SEPTA	TELECOM SYSTEM TECH
P23B	5756	26	SEPTA	MAIL MESSENGER
PSAM	6001	26	SEPTA	CHIEF CUSTOMER SERV SUPV
PSAM	6004	23	SEPTA	DIRECTOR OF TRANSPORTATION
PSAM	6011	15	FTA	POLICE SERGEANT
PSAM	6012	25	SEPTA	REM OFFICER/SUBWAY/SURFACE
PSAM	6013	26	SEPTA	CHIEF SUPV OF STORES

PSAM	6021	23	SEPTA	DEP DIRECTOR OF MAINT
PSAM	6028	25	SEPTA	REM RESOURCES CONTROLLER
PSAM	6031	25	SEPTA	DIST OFFICER REV SERVICES
PSAM	6037	23	SEPTA	SUPERVISOR, CONTROL CENTER-CCT
PSAM	6045	25	SEPTA	SUPV REVENUE COLLECTION
PSAM	6046	25	SEPTA	SUPT REVENUE SERVICES
PSAM	6049	25	SEPTA	SUPV REVENUE SERVICES-DIS
PSAM	6055	15	FTA	POLICE LIEUTENANT
PSAM	6064	23	SEPTA	MGR SUPPLY CHAIN MGMT PLNG & PERFORMANCE
PSAM	6068	21	SEPTA	MGR VENDOR MANAGED IP
P23B	6100	22	SEPTA	MEDICAL ASSISTANT
P23B	6106	22	SEPTA	SR LABORATORY TECHNICIAN
P23B	6107	22	SEPTA	MEDICAL TECHNICIAN
P23B	6108	22	SEPTA	MEDICAL LIBRARIAN
P23B	6110	22	SEPTA	CLERK MEDICAL
P23B	6115	22	SEPTA	PATIENT SERVICE TECHNICIAN
PSAM	6170	23	SEPTA	DEPUTY DIR STATION OPERATIONS
PSAM	6172	22	SEPTA	LABORATORY MANAGER
PSAM	6190	23	SEPTA	DIR PARATRANSIT CONTROL CENTER
PSAM	6200	26	SEPTA	CUSTOMER SERVICE SUPV - CCT
PSAM	6201	26	SEPTA	PARTRANSIT OPER SYSTEMS SUPV
PSAM	6203	26	SEPTA	PARTRANSIT SERVICE COOR
PSAM	6205	26	SEPTA	MGR CUSTOMER SERVICE-P.T.
PSAM	7001	23	SEPTA	SR DIRECTOR RAIL TRANS
PSAM	7006	23	SEPTA	DIRECTOR SAFETY & RISK MGMT

PSAM	7007	23	SEPTA	DIRECTOR, REVENUE OPERATIONS
PSAM	7014	24	SEPTA	CHIEF TECH TRAINING INSTR
PSAM	7039	23	SEPTA	SENIOR DIRECTOR/SUR BUS
PSAM	7051	23	SEPTA	ASST CHIEF OFF VEHICLE MAINT
PSAM	7058	23	SEPTA	DIRECTOR TRAINING & DEVELOPMENT
PSAM	7067	23	SEPTA	CHIEF OFFICER, CCT
PSAM	7068	23	SEPTA	DIR SYSTEM SAFETY & RISK MGMT
PSAM	7077	15	FTA	CHIEF OF POLICE
PSAM	7084	23	SEPTA	CHIEF CONTROL CTR OFFICER
PSAM	7096	23	SEPTA	CHIEF ENG, CAP DESIGN & CON
PSAM	7101	23	SEPTA	ASST CHIEF MECHANICAL OFFICER
PSAM	7119	23	SEPTA	DIRECTOR SERVICE OPS
PSAM	7127	23	SEPTA	CCT OPERATIONS MANAGER
PSAM	7138	23	SEPTA	INSPECTOR GENERAL
PSAM	7143	15	FTA	DEPUTY CHIEF SEPTA POLICE
PSAM	7153	23	SEPTA	MGR REVENUE TRANSPORTATION
PSAM	7163	24	SEPTA	MANAGER RAIL RULES & TRANS
PSAM	7167	24	SEPTA	MGR OPERATIONAL SAFETY
PSAM	7178	23	SEPTA	DIRECTOR-RAILROAD SERVICE
PSAM	7193	23	SEPTA	ASST DIRECTOR RAILROAD SERVICE
PSAM	7204	23	SEPTA	CHIEF SURFACE TRANS OFFICER
PSAM	7210	23	SEPTA	CHIEF REEM OFFICER
PSAM	7218	23	SEPTA	SENIOR DIRECTOR HUMAN RESOURCES
PSAM	7240	24	SEPTA	MANAGER SKILLS TRAINING
PSAM	7241	24	SEPTA	MGR OPERATIONAL SAFETY

PSAM	7242	24	SEPTA	MGR OCC SAFETY & ENVIRON MGMT
PSAM	7247	23	SEPTA	DEPOT COMPLIANCE OFFICER
PSAM	7250	25	SEPTA	DIRECTOR REVENUE EQUIP MAINT & ENGINEER
PSAM	7254	23	SEPTA	QUALITY ENHANCEMENT MGR
PSAM	7266	24	SEPTA	MGR ACCIDENT PREV/INVESTIGATION
PSAM	7279	23	SEPTA	SENIOR DIRECTOR OF MAINTENANCE
PSAM	7280	23	SEPTA	CHIEF ENGINEERING OFFICER
PSAM	7284	15	FTA	POLICE INSPECTOR
PSAM	7286	23	SEPTA	DEP CHIEF OFFICER NPT INTEG
P23B	7682	26	SEPTA	UTILITY STOCK SPECIALIST
P23B	7686	26	SEPTA	STOREKEEPER-PRODUCTION CONTROL
P23B	7687	14	FTA	VEHICLE ELECTRONIC TECHNICIAN
PSAM	8001	23	SEPTA	CHIEF ENGINEER
PSAM	8007	23	SEPTA	CHIEF AUTOMOTIVE OFFICER
PSAM	8009	23	SEPTA	ASST CHIEF ENGINEER POWER
PSAM	8021	23	SEPTA	CHIEF MECHANICAL OFFICER-RRD
PSAM	8023	23	SEPTA	ASST CHIEF ENGINEER
P23B	8513	12	FTA	REVENUE GUARD/DRIVER
P23B	8514	25	SEPTA	RECEIPTS PROCESSOR/GUARD
P23B	8608	26	SEPTA	STOCK CLK RECEIVER
P23B	8609	26	SEPTA	STOCK CLK RECEIVER
P63B	8609	26	SEPTA	STOCK CLERK RECEIVER
P23B	8610	26	SEPTA	STOCK CLK CLASS A
P63B	8610	26	SEPTA	STOCK CLERK CLASS A
P23B	8616	26	SEPTA	STOCK CLK LEADER

P23B	8617	26	SEPTA	STOCK CLK LEADER
P23B	8620	26	SEPTA	STOCK CLERK CLASS B
P63B	8620	26	SEPTA	STOCK CLERK CLASS B
PSAM	9002	24	SEPTA	FIELD INVESTIGATOR
PSAM	9003	24	SEPTA	CHIEF INSTRUCTOR TRANSIT
PSAM	9004	24	SEPTA	INSTRUCTOR TRANSIT
PSAM	9005	24	SEPTA	INSTRUCTOR HIGH SPEED
PSAM	9011	21	SEPTA	WORKERS COMPENSATION FIELD COOR
PSAM	9014	26	SEPTA	POWER DISPATCHER
PSAM	9015	26	SEPTA	SUPV STOREROOM OPS
PSAM	9017	24	SEPTA	CHIEF INSPTOR BRIDGES&BLD
PSAM	9021	15	FTA	POLICE CAPTAIN
PSAM	9045	26	SEPTA	CUSTOMER SVS INFO SYS COORDINATOR
PSAM	9069	24	SEPTA	SAFETY OFFICER OPER. SYST
PSAM	9070	24	SEPTA	ENVIRONMENTAL SAFETY OFFICER
PSAM	9073	26	SEPTA	STRUC INSPTR 2 (STUD TEC)
PSAM	9075	24	SEPTA	TECH TRAINING INSTRUCTOR
PSAM	9082	22	SEPTA	MEDICAL DIRECTOR
PSAM	9096	21	SEPTA	STOREROOM SUPERVISOR
PSAM	9100	26	SEPTA	CONSTRUCTION INSPECTOR
PSAM	9107	15	FTA	TRANSIT POLICE CORPORAL
PSAM	9115	24	SEPTA	SR CONSTRUCTION INSPECTOR
PSAM	9119	24	SEPTA	COST CONTAINMENT COORDINATOR
PSAM	9121	25	SEPTA	REVENUE ATTENDANT
PSAM	9124	26	SEPTA	DESIGNER II (OPS SUPP)

PSAM	9126	15	FTA	SR INVESTIGATOR-LITIGATION
PSAM	9150	15	FTA	CAPTAIN CRIMINAL INVESTIGATIONS
PSAM	9151	15	FTA	CAPTAIN UNIFORM PATROL
PSAM	9152	15	FTA	CAPTAIN STAFF SERVICES
PSAM	9154	25	SEPTA	SUPV REV COLLECTIONS
PSAM	9155	22	SEPTA	OCCUPATIONAL HEALTH CLINICAL SPEC
PSAM	9156	22	SEPTA	OCCUPATIONAL HEALTH NURSE
PSAM	9162	24	SEPTA	INSTRUCTOR REGIONAL RAIL
PSAM	9166	22	SEPTA	MGR PSYCHOLOGICAL SERVICES
PSAM	9168	23	SEPTA	INSPECTOR
PSAM	9169	22	SEPTA	CHIEF PHYSICIAN
PSAM	9172	26	SEPTA	STRUCTURAL INSPECTOR
PSAM	9185	15	FTA	SECURITY AGENT
PSAM	9198	26	SEPTA	INTERNAL INVESTIGATOR
PSAM	9203	21	SEPTA	WORKERS COMPENSATION MGR
PSAM	9207	15	FTA	FELA CLAIMS ADMINISTRATOR
PSAM	9208	24	SEPTA	ENVIRONMENTAL SAFETY PLANNER
PSAM	9910	26	SEPTA	INTERN EMPLOYEE-SAFETY SENSITIVE
PSAM	9911	26	SEPTA	TEMPORARY HELP-SAFETY SENSITIVE
PSAM	9912	26	SEPTA	P/TIME EMPLOYEE-SAFETY SENSITIVE
PSAM	9913	26	SEPTA	P/T PENSIONER SAFETY SENSITIVE
P21M	9991	14	FTA	CTD SPECIALIST APPRENTICE
P21M	9992	14	FTA	CTD 1ST CLASS APPRENTICE
P31M	9993	14	FTA	STD SPECIALIST APPRENTICE
P31M	9994	14	FTA	STD 1ST CLASS APPRENTICE

P41M	9995	14	FTA	FTD 1ST CLASS APPRENTICE
PSAM	9999	23	SEPTA	GENERAL MANAGER
PSAM	E003	23	SEPTA	AGM ENGINEERING MAIN & CONS
PSAM	E004	23	SEPTA	AGM HUMAN RESOURCES
PSAM	E007	23	SEPTA	DEPUTY GENERAL MANAGER
PSAM	E014	23	SEPTA	AGM LIGHT RAIL & SUBURBAN OPS
PSAM	E021	23	SEPTA	AGM OPERATIONS
PSAM	G1014	26	SEPTA	SR PROJ ENGINEER (OPS SUPP)
PSAM	G2094	13	FTA	TRANSPORTATION MANAGER
PSAM	G2110	21	SEPTA	DIR STATION OPERATIONS
PSAM	G4001	13	FTA	TRAIN DISPATCHER
PSAM	G4012	23	SEPTA	DEP DIR OF TRANSPORTATION
PSAM	G4023	25	SEPTA	REVENUE/QUALITY CONTROL
PSAM	G4029	23	SEPTA	STATION MANAGER
PSAM	G5072	26	SEPTA	SECURITY EQUIPMENT SPECIALIST
PSAM	G5131	26	SEPTA	FIELD SERVICE REPRESENTATIVE
PSAM	G6001	26	SEPTA	CHIEF CUSTOMER SERV SUPV
PSAM	G6021	23	SEPTA	DEP DIRECTOR OF MAINT
PSAM	G6028	25	SEPTA	REM RESOURCES CONTROLLER
PSAM	G6045	25	SEPTA	SUPV REVENUE COLLECTION
PSAM	G6049	25	SEPTA	SUPV REVENUE SERVICES
PSAM	G6105	23	SEPTA	SUPV PERSON ASSIGNT OFF
PSAM	G6170	23	SEPTA	DEPUTY DIR STATION OPERATIONS
PSAM	G6190	23	SEPTA	DIR PARATRANSIT CONTROL CENTER
PSAM	G6203	26	SEPTA	PARTRANSIT SERVICE COOR

PSAM	G6205	26	SEPTA	MGR CUSTOMER SERVICE-P.T.
PSAM	G7001	23	SEPTA	SR DIRECTOR RAIL TRANS
PSAM	G7007	23	SEPTA	DIRECTOR, REVENUE OPERATIONS
PSAM	G7039	23	SEPTA	SENIOR DIRECTOR/SUR BUS
PSAM	G7051	23	SEPTA	ASST CHIEF OFF VEHICLE MAINT
PSAM	G7119	23	SEPTA	DIRECTOR SERVICE OPS
PSAM	G7153	23	SEPTA	MGR REVENUE TRANSPORTATION
PSAM	G7163	24	SEPTA	MANAGER RAIL RULES & TRANS
PSAM	G7167	24	SEPTA	MGR OPERATIONAL SAFETY
PSAM	G7193	23	SEPTA	DEPUTY DIRECTOR RAILROAD SERVICE
PSAM	G7204	23	SEPTA	CHIEF BUS OP OFFICER
PSAM	G7210	23	SEPTA	CHIEF REEM OFFICER
PSAM	G7247	23	SEPTA	DEPOT COMPLIANCE OFFICER
PSAM	G7266	24	SEPTA	DEPUTY DIR SYSTEM SAFETY
PSAM	G8007	23	SEPTA	CHIEF AUTOMOTIVE OFFICER
PSAM	G8021	23	SEPTA	CHIEF MECHANICAL OFFICER-RRD
PSAM	G9004	24	SEPTA	INSTRUCTOR TRANSIT
PSAM	G9005	24	SEPTA	INSTRUCTOR HIGH SPEED
PSAM	G9069	24	SEPTA	SAFETY OFFICER OPER. SYST
PSAM	G9075	24	SEPTA	TECH TRAINING INSTRUCTOR
PSAM	G9100	26	SEPTA	CONSTRUCTION INSPECTOR
PSAM	G9115	24	SEPTA	SR CONSTRUCTION INSPECTOR
PSAM	G9119	24	SEPTA	COST CONTAINMENT COORDINATOR
PSAM	G9121	25	SEPTA	REVENUE ATTENDANT
PSAM	G9126	15	FTA	SR INVESTIGATOR-LITIGATION

PSAM G9154 25 SEPTA SUPV REV COLLECTIONS
PSAM GE005 23 SEPTA INSPECTOR GENERAL
PSAM GE014 23 SEPTA AGM LIGHT RAIL & SUBURBAN OPS

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APPENDIX D

Treatment Resources

SEPTA's Employee Assistance Program is:

Penn Behavioral Health

24-hour Hot Line: [REDACTED]

Any employee or family member may self-refer in confidence to the EAP. Confidential referrals may also be made by co-workers, union representatives, and supervisors.

Important note: the EAP is, by conscious decision by the SEPTA Board, a "broad-brush" program. Because hundreds of SEPTA families utilize the service for various problems of living, there is no drug or alcohol stigma connected with a visit to the EAP.

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APPENDIX E

Classes of Reportable Prescription and Patent Medications

Below is a list of prescription drugs and patent medicines as referenced in the Drug-Free Workplace Policy. Operating employees who have consumed any of the prescription drugs described are required to report such consumption to the Medical Department using SEPTA Form F-0699 (Prescriber's Report and Recommendation) or, at the employee's discretion, to his or her immediate supervisor for transmission to the Medical Department prior to reporting for work. Upon request of the employee, the Medical Department will give individual consideration, after examination and review of attending physician recommendation, on the work status of employees using these medications. This list is intended only as a guide and is not all-inclusive. Employees and/or supervision should confer with the Medical Department regarding any questions on medications that are not listed.

ANALGESICS

Aspirin w/codeine, Codeine, Darvocet, Darvon, Demerol, Dilaudid, Empirin Compound w/codeine, Fiorinal, Methadone, Morphine, Percocet, Percodan, Soma Compound w/codeine, Talacen, Talwin, Tylenol w/codeine, Vicodin.

ANTI-MOTION-SICKNESS

Antivert, Dramamine, Phenergan, Transderm-Scop.

TRANQUILIZERS & SEDATIVES

Ambien, Ativan, Benadryl, Centrax, Compazine, Dalmane, Halcion, Haldol, Librium, Phenergan, Prolixin, Serax, Stelazine, Thorazine, Tranxene, Valium, Xanax.

ANTIDEPRESSANTS

Amitriptyline, Desyrel, Elavil, Limbitrol, Lithium, Nardil, Norpramin, Pamelor, Parnate, Pertofrane, Sinequan, Surmontil, Tofranil, Triavil, Vivactil.

BARBITURATES

Butalbitol, Butisol, Dilantin, Mebaral, Nembutal, Pentobarbital, Phenobarbital, Secobarbital, Seconal, Tuinal.

SKELETAL MUSCLE RELAXANTS

Flexeril, Parafon, Skelaxin, Soma.

OTHER

Marinol

NON-PRESCRIPTION COUGH & COLD REMEDIES, ANTIHISTAMINES

(Not required to be reported, but employees should pay particular attention to labels indicating drowsiness or restrictions regarding driving and/or working around machinery, and adjust their dosage and work schedule accordingly.)

Benadryl, Bromfed, Chlortrimeton, Comtrex, Contac, Deconamine, Dimetapp, Dristan, Drixoral, Extendryl, Fedahist, Kronofed, Naldecon, Nalamine, Novafed, Nyquil, Ornade, Phenergan, Rondec, Rynatan, Sinubid, Sinulin, Tavist-D.



Southeastern Pennsylvania Transportation Authority

**Prescriber's Report
and Recommendations**

SEPTA Medical Department
1234 Market Street
Philadelphia, PA 19107-3780



Name: _____

Account Number: _____

Work Location: _____

Job Title: _____

Daytime phone number: _____

Safety Sensitive Employee Completes This Section:

Employee's SEPTA Job Function – check those that apply.

- Operate a transit bus, train, trolley, or rail vehicle.
- Operate a non-revenue service vehicle requiring a commercial driver's license (e.g., trucks over 25,000 lbs.).
- Control the dispatch or movement of transit bus, train, trolley, or rail vehicle.
- Maintain/repair transit buses, trains, trolleys, or rail vehicles or the electro-mechanical systems controlling train or rail vehicle movement.
- Carry a firearm for security or law enforcement purposes.
- Duties require the performance of any of the above functions.
- Not safety sensitive but taking medication that may produce drowsiness

Reason medication(s) currently being taken _____

I authorize the release of prescription drug information to SEPTA Medical.

Employee Signature _____ Date _____

Physician or Licensed Healthcare Provider Completes This Section:

As the attending physician or licensed healthcare provider, I have prescribed the following medication(s) to be taken from _____ to _____

Name of Medication and Dosage _____ Name of Medication and Dosage _____

Name of Medication and Dosage _____ Name of Medication and Dosage _____

Name of Medication and Dosage _____ Name of Medication and Dosage _____

(PLEASE CHECK ONE OF THE FOLLOWING.)

- Employee may not perform safety-sensitive duties while taking this medication.
- Employee released to perform safety-sensitive duties while taking this medication.

Name (please print) _____ Telephone Number _____

Signature _____ Date _____

SEPTA Medical Completes This Section:

- This medication is approved to take.
- This medication has been determined to potentially impair an employee's performance. If the employee is in a safety-sensitive position and/or drives SEPTA vehicles, then this medication should not be taken within eight (8) hours of the employee reporting for duty, during the hours that the employee is subject to duty, or while the employee is on duty.
- The employee should contact his/her physician or licensed healthcare provider to discuss an alternate schedule to take this medication or obtain another medication which will not impair his/her job performance or interfere with his/her work schedule.
- Employee notification (Initials and date).

SEPTA Medical Signature _____ Date _____

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APPENDIX G

Synopsis and Frequently Asked Questions

The premise of the Drug Free Workplace Policy is that an effective anti-drug program must have three main parts operating together: Education, Employee Assistance, and Random Testing. If any part were implemented separately, the goal of a drug-free workplace would be impossible to achieve in a reasonable time frame. By taking a combined approach, each of the three main parts can be presented in an unobtrusive, confidential and dignified manner. Because SEPTA is convinced that this combined approach is the only kind of anti-drug effort that is effective in the long term, it is now the only such program being made available by the Authority. Described below, in capsule form, are the main features of the Drug Free Workplace Policy.

I. EDUCATION

SEPTA will, from time to time, provide drug-educational materials, as well as educational modules in regularly scheduled safety meetings, rule-review sessions, or specially scheduled meetings.

II. EMPLOYEE ASSISTANCE

SEPTA understands that despite the preventive effect of education, people who become troubled by substance abuse will need help in overcoming their problem. SEPTA is deeply concerned not only with the safety of the riding public, but also with the health and welfare of its individual employees. Because of that concern, SEPTA makes available to all of its employees and their family members a state-of-art Employee Assistance Program (EAP). While the Drug Free Workplace Policy focuses on substance abuse and uses the EAP when an employee is detected to have a substance abuse problem, the EAP is not just a drug and alcohol treatment program, but can be used by any SEPTA employee at any time for any sort of personal problem. In addition to helping with substance abuse problems, the EAP can help with job, marital, or family stress, depression, anxiety, and general problems in living in today's stressful world. Employees who do use the EAP for help with a substance abuse problem will be treated in a sensitive and confidential manner, and no information about their cases will be released to anyone without explicit, written consent. There is no limit to how many times an employee can call the EAP for help.

III. RANDOM TESTING FOR DRUGS AND ALCOHOL

Since some employees who use drugs may not realize that they should seek treatment, employees in safety-sensitive jobs will be selected at random, and required to take a drug test. The selection process is carefully designed to provide an across-the-board equal probability for everyone, and is carried out by an outside, impartial consultant.

Employees who are selected will report to the testing site, and will provide a sample of breath and a sample of urine under sanitary, private, and secure conditions. The specimens will be handled in a prescribed manner under the employee's observation, and a legal chain-of-custody document will be sealed in a package with the urine specimen for shipment.

Breath testing will be performed by Breath Alcohol Technicians on government-approved equipment. Urine testing will be done by a DHHS-certified toxicology laboratory, and no results will be considered positive unless confirmed by the most-accurate method available (the current method of confirmation is called Gas Chromatography and Mass Spectrometry).

If a random specimen is found to contain drugs or alcohol, the employee and the Medical Review Officer will review the reports and documentation in private. If the report is found to be accurate, the employee will then be offered, on a one-time basis, a referral to the EAP for appropriate treatment, and follow-up.

IV. QUESTIONS AND ANSWERS

A. How Do I Get Treatment?

There are several ways:

- . Call the EAP directly
- . Ask your Supervisor for referral
- . Ask your Union representative for referral

B. Who Pays for My Treatment?

All treatment is arranged in accordance with your available health insurance benefits. As with other medical problems, each insurance program has certain limitations that may apply; and, as with other medical expenses, any balance remaining after your insurance is applied will be your responsibility.

C. How Much Treatment Can I have?

In general, there is no limit to how many times an employee can voluntarily request treatment, other than that set by the employee's insurance. The only limit under the program is that an employee can have only one positive test in his or her career.

D. What Happens If I Volunteer for Treatment?

SEPTA naturally wants employees who have a drug or alcohol problem to come forward voluntarily rather than wait and take their chances with random testing. SEPTA does not conduct special follow-up tests of volunteers after they return to work. Instead, the treatment center conducts a final test for clearance to return to work, and these results are sent directly to the EAP, not SEPTA. Of course, once back at work, an employee who has volunteered is still subject to random testing based on his or her job.

E. What Happens If I Test Positive On A Random Test?

Employees who test positive on random testing for the first time will be treated as sick, medically held off from work, and referred to the EAP for evaluation. After completing any prescribed treatment, you will return to your regular job, and be subject to special follow-up testing conducted by SEPTA in addition to regular random testing.

F. Can I Have Sick Pay While I Am In Treatment?

Yes, SEPTA considers drug addiction an illness, so if you are normally eligible to draw sick pay for medical problems, you can draw it while receiving treatment for drugs or alcohol.

G. What If My Sick Time Runs Out While I Am In Treatment?

While in treatment you will use the sick days you have available. If you should run out of available days you will not be dropped, but will be placed on administrative leave until your treatment is completed.

Drug Free Workplace

Program Manual

APPENDIX H

Vendors and Program Officials

DHHS CERTIFIED LABORATORIES:

Primary: Laboratory Corporation of America
69 First Avenue
Raritan, NJ 08869

Re-analysis: Elsohly Laboratories, Inc.
5 Industrial Park Drive
Oxford, MS 38655

MEDICAL REVIEW OFFICERS:

[REDACTED]
1234 Market Street
Philadelphia, PA 19107
[REDACTED]

SUBSTANCE ABUSE PROFESSIONAL:

[REDACTED]
3550 Market Street
Philadelphia, PA 19104
[REDACTED]

LABORATORY MANAGER/COMPLIANCE OFFICER:

[REDACTED]
1234 Market Street
Philadelphia, PA 19107
[REDACTED]

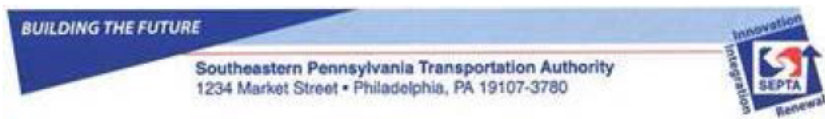
ATTACHMENT 2 - Medical Factual Report
DCA17FR003 - Philadelphia, Pennsylvania, January 4, 2017

From: [Sauer, Scott A](#)
To: [Webster Nicholas](#); [Erinoff, Jeffrey](#); [Page Ricky](#); [Hoepf Michael](#)
Cc: [Aufschauer, Jacob T](#)
Subject: RE: DCA17FR003 - Philadelphia, Pennsylvania, January 4, 2017 - Medical Factual Report - MEDICATION ADVISORY
Date: Friday, July 7, 2017 3:02:31 PM

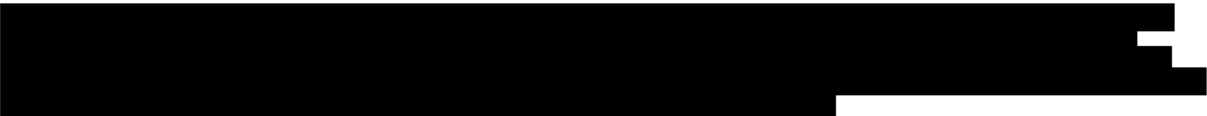
Nick,

This is the advisory that was distributed system-wide. The notice was delivered to every supervisory, administrative, and management employee directly via their email and has been posted in every employee reporting location.

--



Scott A. Sauer, CSP, WSO-CSSD
Assistant General Manager, System Safety
SEPTA



From: SEPTA_Broadcast
Sent: Thursday, June 22, 2017 3:40 PM
Subject: MEDICAL DEPARTMENT ADVISORY:

NOTICE

**Medical Department Advisory
for Over the Counter Medications**

-

Anyone who performs safety-sensitive work needs to know there are over-the-counter medicines that can make you drowsy and can affect your ability to drive and operate machinery safely.

Over-the-counter medicines are also known as OTC or nonprescription medicines. All these terms mean the same thing: medicines that you can buy without a prescription from a healthcare professional. Each OTC medicine has a **Drug Facts** label to guide you in your choices and to help keep you safe. OTC medicines are serious medicines and their risks can increase if you don't choose them carefully and use them exactly as directed on the label.

Choosing and Using Safely

You should read all the sections of the **Drug Facts** label before you use an OTC medicine. But, when you know you have to drive or perform safety-sensitive work, it's particularly important to take these simple steps:

First, read the "active ingredients" section and compare it to all the other medicines you are using. Make sure you are not taking more than one medicine with the same active ingredient. Then make sure the "purpose" and "uses" sections of the label match or fit the condition you are trying to treat.

Next, carefully read the entire "Warnings" section. Check whether the medicine should not be used with any condition you have, or whether you should ask a health care professional whether you can use it. See if there's a warning that says when you shouldn't use the medicine at all, or when you should stop using it.

The "**When using this product**" section will tell you how the medicine might make you feel, and will include warnings about drowsiness or impaired driving.

Look for such statements as "you may get drowsy," "marked drowsiness will occur," "Be careful when driving a motor vehicle or operating machinery" or "Do not drive a motor vehicle or operate machinery when using this product."

Here are some of the most common OTC medicines that can cause

drowsiness or impaired driving:

- **Antihistamines:** These are medicines that are used to treat things like runny nose, sneezing, itching of the nose or throat, and itchy or watery eyes. Some antihistamines are marketed to relieve cough due to the common cold. Some are marketed to relieve occasional sleeplessness. Antihistamines also can be added to other active ingredients that relieve cough, reduce nasal congestion, or reduce pain and fever. Some antihistamines, such as diphenhydramine, the active ingredient in Benadryl, can make you feel drowsy, unfocused and slow to react.
- **Antidiarrheals:** Some antidiarrheals, medicines that treat or control symptoms of diarrhea, can cause drowsiness and affect your driving. One of these is loperamide, the active ingredient in Imodium.
- **Anti-emetics:** Anti-emetics, medicines that treat nausea, vomiting and dizziness associated with motion sickness, can cause drowsiness and impair driving as well.

Jeffrey Erinoff, DO, MPH, FACOEM
Medical Director

From: Webster Nicholas [REDACTED]
Sent: Friday, July 07, 2017 2:48 PM
To: Erinoff, Jeffrey; Page Ricky; Hoepf Michael
Cc: Sauer, Scott A; Aufschauer, Jacob T
Subject: RE: DCA17FR003 - Philadelphia, Pennsylvania, January 4, 2017 - Medical Factual Report - MEDICATION ADVISORY

Jeff,

I am trying to close out the Medical Factual Report and post it to our docket.

During the tech review SEPTA said the Medication Advisory was going to be published shortly. I am checking on the status of this advisory, if it has been published I will add a section to the medical factual titled postaccident actions and discuss the safety accomplishment. ■

Nick

[REDACTED]