



Fossil Generation
Contractor Substance Abuse Instruction Letter
CONTRACTORS SUBSTANCE ABUSE PROGRAM

GENERAL PROGRAM & ADMINISTRATION

Effective August 1, 2017, all contractors, subcontractors, and maintenance contractors performing work at FirstEnergy (FE) Fossil Generation Facilities are required to participate in the FirstEnergy Contractors Substance Abuse Compliance Specification or an approved annual testing/consortium program. FirstEnergy has selected an independent Third Party Administrator (TPA), **Mobile Medical Corporation (MMC)**, to administer the substance abuse program at all FE Fossil Generation facilities. MMC will manage all collections, verifications, analysis, reporting, maintenance of records and all confidential information. MMC will develop a comprehensive database of all FE Fossil Generation facilities contractor's employee's records in an effort to eliminate repetitive testing and work loss time.

Prior to mobilizing at FirstEnergy Fossil Generation facilities contractors are required to contact the MMC office associated with the FE location where their work will be performed in order to:

- **Provide Company Registration Form** (i.e. address and Designated Representative information)
- **Provide Company Online Access Form** For each individual needing access to the online database
- **Validate employee**
 - Contractor needs to go online to verify all employees working at a FirstEnergy plant via the online access system.
 - This must be done for **EACH** plant when they are going to work
 - FE Verification form is submitted to the plant via the online system as documentation of eligible employees for a specific contractor
 - If current test not found for employee, pre-employment test must be collected
- **Have a new Entrance test collected** (Test will be collected an approved collection site set up by MMC, at the MMC office, or onsite at the plant prior to starting work at a FE generation facility)



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Substance abuse testing is available at the FE facilities or at approved collection sites.
Contact your MMC office with any questions and to arrange testing.

Photo identification will be required at the time of testing.

FirstEnergy is responsible for payment of all Entrance and Random Testing

ENTRANCE/ANNUAL DRUG TESTING

Prior to starting work at a FE Fossil Generation property all employees must have:

- A current hair follicle test within the last twelve months via verification through the online system
 - If an employee's test is not current in the online verification system then a new test is required
- Employees who do not have a current drug test will be required to have an entrance test
 - Test can be administered at MMC office, at an approved collection site, or onsite.
 - When possible, the Contractor should attempt to have all employees who do not have a current test to be tested
 - NOTE: Contractor Employees **WILL** be permitted to work pending results of the test, **AFTER** the Entrance Test is completed

RANDOM DRUG TESTING

Contractors, who are on-site, shall have random drug testing on their employees

- A target of 20% per month, of all current employees, will be selected by a computerized random generator process
- Testing will be conducted on-site without prior notice
- Random testing will be sent to a certified laboratory for testing and confirmation

REASONABLE SUSPICION / FOR CAUSE DRUG and/or ALCOHOL TESTING

A test shall be administered to an individual in the event a trained supervisor or FE representative has reasonable cause to believe that an employee has reported to work under the influence, or is or has been under the influence while on the job; or has violated this drug policy.

- During the process of establishing reasonable cause for testing, the employee has the right to request his on-site union representative to be present
- Specific forms and procedures must be followed as outlined in the FE Fossil Generation policy
- Contact your local MMC office to schedule the required testing: drug and /or alcohol and provide completed documents
 - If it is off hours 8pm – 8am, the contractor can call the Emergency Number for testing
 - **NOTE:** Emergency Service costs will be at the responsibility of the contractor
- Reasonable cause testing requested by FE is reimbursed if the results are negative

FOR CAUSE GROUP TESTING

FE, at its sole discretion, may initiate testing of a group of Contractor employees under a reasonable classification (i.e. group, shift, location, etc.) The method will be deemed by FE. This testing can be prompted by FE's good faith, reasonable belief that the present or use of drugs has extended beyond a single individual.

POST INCIDENT DRUG and/or ALCOHOL TESTING

A contract employee is subject to submit to a Post-Incident (PI) test when it is reasonable to believe that drug and/or alcohol use could have contributed to the injury/illness or Property damage sustained.

- PI testing must be completed within thirty-two (32) hours of the incident and alcohol testing within eight (8) hours of the incident
 - If testing cannot be completed, contractor should place a written explanation of the details of the incident/near miss and reason(s) for not testing the employee, which could be reviewed by FE in the Contractor's employee's file
- Notify your local MMC office regarding any PI testing. They will work with you to properly complete the testing and documentation in a timely manner
 - If it is off hours 8pm – 8am, the contractor can call the Emergency Number for testing
 - **NOTE:** Emergency Service costs will be at the responsibility of the contractor

MEDICAL REVIEW OFFICER (MRO) INTERVIEW

- The MRO will conduct an interview with any employee whose test yields a non-negative result. If the employee produces a valid prescription for a legal drug the test will be confirmed Negative.

REPORTING AND CONFIDENTIALITY

Protecting the confidentiality of individuals is a primary interest of FE, contractors, and labor. Therefore, there is a single entity contracted to provide Medical Review Officer (MRO) services for the FirstEnergy Fossil Generation Contractor Substance Abuse Compliance Specification requiring laboratory analysis administered by Mobile Medical Corporation. Only the MRO has access to an individual's medical records. The MRO, third party administrator (Mobile Medical Corporation), and individual contractor Designated Representative (DR) have access to an individual's laboratory drug screening results. No information about test results, substances, levels of screening, or any other specific information will be shared with any party other than listed in the preceding statement.

The following procedures and guidelines regarding confidentiality will be strictly observed:

1. All test results will be considered medical records and held confidential to the extent permitted by law.
2. All actions taken in connection with the Policy will remain confidential.
3. Only the MRO will have detailed information concerning an individual's laboratory drug screening.
4. Only the MRO or the TPA may disclose whether an individual is current or not current with the Policy.
5. Medical personnel, the contractor, its supervisors, or any other personnel will not disclose any information regarding the screening of an individual.
6. Information may be divulged for grievances, arbitration, and/or litigation with respect to these matters to the extent permitted by law.

BILLING

All costs for administering the Policy including testing is to be borne by FE with the following exceptions:

- 24/7 Emergency Collection Service
- Blood Testing for 3rd alternate method for Entrance Testing
- Challenging a Test result

Emergency 24/7 Collection Service and associated test fees will be back charged to the Contractor by FE.