PHMSA Drug & Alcohol Testing Management Information System (MIS) Reporting Guidance
Reports Due March 15 for the Previous Calendar Year

Table of Contents

General Guidance

Pipeline drug and alcohol test results must be submitted on Form DOT F 1385 in accordance with the form's instructions. The form and instructions can be obtained online at
http://www.dot.gov/odapc/MISreporting
This document provides additional Pipeline and Hazardous Materials Safety Administration (PHMSA)-specific guidance for pipeline, liquefied natural gas (LNG) facility, and underground natural gas storage facility operators.

PHMSA regulations require operators and contractors to submit MIS reports online at
http://damis.dot.gov - see the next section for user name and password details.

PHMSA may require pipeline, LNG, and underground natural gas storage operators to report annually – see next section. If reporting is required, data for both operator covered employees and contractor covered employees must be submitted. Covered employees must be limited to those company or contractor employees who actually performed, were ready to perform, or were immediately available to perform an operation, maintenance, or emergency-response function on a PHMSA regulated pipeline or LNG facility during the calendar year.

For questions about MIS submittal, contact:
        InformationResourcesManager@dot.gov   202-366-8075
For questions about PHMSA regulations, contact:
        InformationResourcesManager@dot.gov

Do I Need to Submit a Pipeline MIS Report?

MIS reporting in PHMSA regulations is based on the total number of covered employees. To determine the total number of covered employees:

      1. Determine the number of operator covered employees that will be included in the report. Include employees for the primary OpID and all business unit OpID(s) covered by the report. If your covered employees are in a random drug testing pool managed by a consortium, count only your own covered employees.

      2. Determine the number of contractor covered employees for all companies linked to the report. If contractor covered employees are in a random drug testing pool managed by a consortium, count only the covered employees for your contractor(s).

      3. Adding 1. and 2. results in the total number of covered employees.

If the total is <u>50 or more covered employees</u>, a Pipeline MIS report is required. In late December each year, your online reporting <u>user name</u> and <u>password</u> are available in the PHMSA Portal - https://portal.phmsa.dot.gov/pipeline.

If the total is <u>less than 50 covered employees</u>, a Pipeline MIS report is required only if you receive "written notice" from PHMSA requesting a report. PHMSA transmits a "written notice" as a message in the PHMSA Portal - https://portal.phmsa.dot.gov/pipeline – in late December each year. If the PHMSA Portal message includes an online reporting user name and password, PHMSA has requested a report, regardless of the total number of covered employees.

Registered PHMSA Portal users for an operator typically include your compliance officer and staff or consultants with responsibility for submitting annual and incident reports on PHMSA F 7000- and 7100-series forms. For operators without any staff registered in the PHMSA Portal, the operator staff responsible for submitting MIS reports can register in the Portal at
https://portal.phmsa.dot.gov/phmsapub/faces/EnrollmentV2.jspx?_afrLoop=2248746351610602&_afrWindowMode=0&_adf.ctrl-state=p9y0aaynd_22
by following the instructions at
https://portal.phmsa.dot.gov/PHMSAPortal2/staticContentRedesign/howto/PortalAccountCreation.pdf

PHMSA Safety Program Relationships

PHMSA pipeline safety regulations require pipeline facility operators to have written safety programs to cover certain topics, including Drug & Alcohol Testing. Some operators have their own Drug & Alcohol Testing program, which covers only the pipeline facilities under their OpID. In other cases, multiple operators have a "D&A" safety program relationship (SPR) and share the same Drug & Alcohol Testing safety program.

PHMSA regulations require operators to maintain accurate SPR data when changes occur by submitting Type C National Registry Notifications – see §191.22 and §195.64. When a program is shared by multiple OpID, each OpID reports the same "primary OpID" to PHMSA. In the MIS, only SPR "primary OpID" submit reports. All other OpID reporting the same "primary OpID" must appear as business unit OpID in the MIS.

SPR data is maintained by PHMSA and MIS data is maintained by the Department of Transportation. Changing PHMSA SPR data will not change an MIS primary and business unit relationship. Conversely, changing MIS primary and business unit relationships will not change PHMSA SPR data. When changes

                                       11-14-2018

occur, operators must make the changes in both PHMSA data and Department of Transportation MIS data.

Business Units and Contractors

After log-in to the online reporting system as the MIS primary OpID, establish the scope of the report for both operators and contractors. If the report will cover more than the MIS primary OpID, the additional OpIDs are referred to as business units. Either add the business unit OpID(s) or verify the list carried forward from a previous year. The MIS primary OpID and business unit(s) must include all OpID submitting the same primary OpID in PHMSA Safety Program Relationship (SPR) data – see previous section. The MIS primary OpID must be the same as the SPR primary OpID. Either add or edit contractors to build the correct list of contractors. Include only those contractors with employees who performed covered functions for the operator in the calendar year being reported. Contractors who performed safety-sensitive work for other modes, such as FMCSA, but not for PHMSA, should not be included in the PHMSA MIS report. You will need the Business Tax Identification Number (BTIN) for each contractor. Click on "User Name and Password List" to obtain an online reporting user name and password for each contractor.

Operator and contractor data are entered in separate reports and each contractor is reported individually. The contractor user name and password associates a contractor report to the operator report. Contractors who performed covered functions for multiple operators, must submit multiple reports, one for each OpID, or group of OpIDs, for whom the contractor performed covered functions. Since contractors can enter data directly, the operator must accept the linked contractor reports before the operator report is submitted.

Click on "Enter or Edit Your Data" to continue creating the report.

Section I. Employer

If your OpID previously submitted an MIS report, some of the contact information may be prepopulated for both the operator report and the associated contractor reports. Enter or correct the information about the company, either operator or contractor, submitting the report. On the *Doing Business as (DBA)* line list the submitting operator's OpID and all business unit OpIDs covered by the report.

Click on "Covered Employees" to continue creating the report.

Section II. Covered Employees

Enter the number of covered employees for the report. If you are creating an operator report, include operator covered employees for all OpID covered by the report. If you are creating a contractor report, enter the number of covered employees who actually performed, were ready to perform, or were immediately available to perform an operation, maintenance, or emergency-response function for any of the OpID(s) in the report.

If a covered employee performs multi-DOT mode functions (e.g., an employee drives a commercial motor vehicle and performs pipeline maintenance duties), count only the employees with 51 percent or more of their time performing pipeline covered functions.

Click on "Drug Testing" to continue building the report.

Section III. Drug Testing Data

The table in this section requires drug test data by test type and by result. The categories of test types are: Pre-Employment; Random; Post-Accident; Reasonable Susp./Cause; Return-to-Duty, and Follow-Up. The categories of results are: Total Number of Test Results; Verified Negative; Verified Positive; Positive for Marijuana; Positive for Cocaine; Positive for PCP; Positive for Opiates; Positive for Amphetamines; Refusals due to Adulterated, Substituted, "Shy Bladder", and Other Refusals to Submit to Testing; and Cancelled Results.

For employers whose employees perform covered functions under multiple DOT modes, only report data for tests where **PHMSA was selected on the Federal Drug Testing Custody and Control Form (CCF)**. For example, if an employee with a commercial driver license was post-accident tested after a traffic accident, FMCSA would be selected in Step 1D of the CCF. This test would **not** be reported to PHMSA. If FMCSA requests MIS data, only tests with FMCSA selected in Step 1D of the CCF should be reported to FMCSA.

The online reporting system will calculate the Total Number of Test Results column and the TOTAL row. Enter all the non-zero data, then click the "set remaining blanks to zero" button to complete this section.

Click on "Alcohol Testing Data" to continue building the report.

Section IV. Alcohol Testing Data

The table in this section requires alcohol test data by test type and by result. Pipeline, LNG, and underground natural gas storage operators enter data for four or five test types: Pre-employment, Post-Accident, Reasonable Susp./Cause, Return-to-Duty, and Follow-Up. The categories of results are: Total Number of Screening Test Results; Screening Tests with Results Below 0.02; Screening Tests with Results 0.02 Or Greater; Number of Confirmation Test Results; Confirmation Tests with Results 0.02 through 0.039; Confirmation Tests with Results 0.04 Or Greater; Refusals due to "Shy Lung" and Other Refusals to Submit to Testing; and Cancelled Results.

For employers whose employees perform covered functions under multiple DOT modes, only report data for tests where **PHMSA regulations led to the test**. For example, if an employee with a commercial driver license is post-accident tested after a traffic accident, this test would **not** be reported to PHMSA. If FMCSA requests MIS data, only tests driven by FMCSA regulations should be reported to FMCSA.

The online reporting system will calculate the Total Number of Screening Test Results column and the TOTAL row. Enter all the non-zero data, then click the "set remaining blanks to zero" button to complete this section.

Click on "Wrap Up" to continue building the report.

Online Wrap Up

Several validation checks will be run when you enter this online section. Warning messages will guide you to sections of the report that are incomplete. As mentioned earlier, all contractor reports associated with the operator report must be accepted or rejected before the operator's report can be submitted.

You must click on "Electronically Sign" to submit the report. If you subsequently discover errors in the report and make changes, you must click on "Electronically Sign" after making the changes to submit the revised report.

The wrap up section also provides options to save a .pdf file of the report and send an email confirming submittal.