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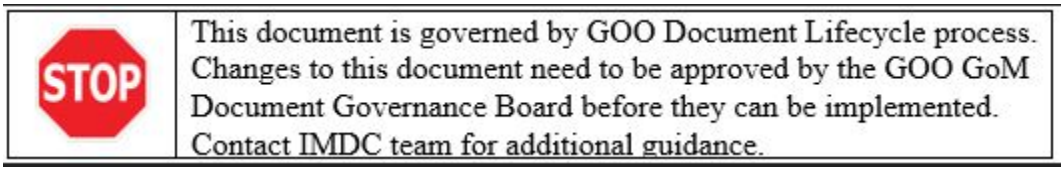
Operations: HSE
Health and Industrial Hygiene

Contractor Substance Abuse Policy



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AMENDMENT RECORD

Amendment Date	Revision Number	Amender Initials	Amendment
9	05/09/2019	VMurray, PMGlencross	Personnel searches added
8	02/18/2019	VMurray, DHaines	Added company, employee, medic, BP supervisor, security, OHN, MRO, requirements in Key Responsibilities. Clarification of oral alcohol screening test, suspicious substances, other federal testing requirements, reinstatement requirements. Added section on amphetamine letters for heliport (duplicated from Medication Policy)
7	06/22/2017	VMurray, DHaines	Reformated, revised. Added roles. Revised reasonable suspicion indication to match US Policy. Added SMI testing. Added cut-off levels for non-DOT, hair, oral. Removed Contractor cost. Removed Exceptions. Removed new hire 90 day testing req. Updated Definitions. Added references.
6	10/28/2015	VMurray	Document reviewed with no changes.
5	11/25/2014	VMurray	Document reviewed with no changes.
4	9/23/2013	CCurtis	Reviewed and updated next review date
3	9/15/2012	CCurtis	Updated SPU to Region Added hair to acceptable sampling methods
2	5/5/2011	CCurtis	Updated Sampling Standards to meet current DOT standards, Changed requests for reinstatement from responsible party to Security Director Custodian changed from Greg Lynch to Christine Curtis
1	3/29/2010	GLynch	Changed custodian from Dennis Johnson to Greg Lynch. Updated next review date.

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1. Purpose / Scope

BP GOM ('Company') has a strong commitment to provide a safe work place for its employees, contractors, and other persons working or visiting its premises or projects. This Policy concerning substance abuse, in addition to the (US) BP Drug and Alcohol Misuse Policy, assists in maintaining a safe working environment and protecting Company property,

This Policy applies to contractors, subcontractors, and vendors (hereinafter referred to as "Contractor" or "Contractors") who perform labor or services on Company premises, on Company Projects, or on whose premises Company employees spend substantial time. A "Company Project" refers to any work performed under the contract. The policy shall apply to employees of the Contractor or vendor or to any employees furnished by or on behalf of Contractor or vendor.

2. Key Responsibilities

2.1. Contractor Company and Designated Employer Representative

A. Must have and administer a formal substance abuse policy:
   i. which informs Contractors about the risks of using alcohol, illegal drugs, or misusing prescription and over-the-counter drugs.
   ii. which applies to employees of the Contractor or to any employees furnished by or on behalf of the Contractor.
   iii. which includes substance testing of the Contractor's employees entering Company premises or working on Company Projects.
   iv. must meet the minimum testing standards as set forth in this policy.
   v. Coordinate requirements for Designated Employer Representitive with third party vendors for BP (eg. Psychomedics, DISA), to enhance the Contractor Company's drug and alcohol program and comply with BP's policies.

B. Shall submit a copy of their policy and program to the Company employee designated to administer contracts or to such other individual as may hereafter be designated by Company.

C. Must have a Designated Employer Representative (DER) available to receive reports related to positive drug tests and respond to collection site irregularities.

D. Must meet Federal regulations (DOT, USCG) regarding Drug and Alcohol testing of regulated employees, such as licensed mariner, designated safety sensitive positions, and following Serious Marine Incident .

E. Cooperates with Medical Review officer in evaluation and medical clearance of employees prescribed Dangerous or Restricted medication which are detected during drug testing.
F. If Contractor Company wishes employee to be returned to BP facilities following an employee's violation of this policy, assists and complies with BP reinstatement policy for offshore access.

2.2. Contractor Employee (Contractor)

A. Refrains from use of prohibited substances (Sec. 3.1)
B. Completes all required drug and alcohol testing (random, reasonable suspicion, post accident or Serious Marine Incident, and site/location unannounced testing) as required by BP and GoM policies. Takes no action which would conceal prohibited drug use (eg. tampering with collection, shaving hair). Cooperates with Medical Review Officer (MRO) for non-negative laboratory results.
C. Notifies BP Offshore Medic or BP Occupational Health Nurse (OHN) of Dangerous and Restricted medications, chemicals, and dietary supplements as per BP GoM Medication Policy.
D. Reports to their Human Resources contact or DER any fellow workers suspected of prohibited drug use, and on-duty or offshore alcohol use. If immediate action is needed for safety, report to Medic or Offshore Installation Manager (OIM).
E. Refrains from drinking alcohol 8 hours following an event subject to post-accident or Serious Marine Incident (SMI) testing, or until testing is completed.
F. Complies with drug searches of person, possessions, bags, room, mail, and dog searches.
G. Provides a valid prescription and any additional information to the Designated Employer Representative (DER) for Attention Deficit Hyperactivity Disorder (ADHD) medication or other prescription medication detected on drug tests in order to comply with this policy or the Medication Policy.
H. Complies with all requirements set by their employer and BP if needed for reinstatement of offshore access following a policy violation.

2.3. BP Offshore Medic

A. Maintains DOT certification and training, and practice for drug and alcohol collections offshore through BP approved vendor. Medic's employer will coordinate and provide DOT and training.
B. Receives notification from Contractors of prescription and over the counter medications, chemicals, and dietary supplements. Ensure compliance with the Medication Policy.
C. Completes drug and alcohol testing on the facility when required including random, post-accident, SMI, reasonable suspicion, and unannounced testing.

2.4. BP Supervisor

A. Consults with Contract Company Representative or DER prior to conducting post accident,

SMI testing, reasonable suspicion, or unannounced testing on Contractors

B. Notifies Medic or OHN following an event subject to post-accident or SMI testing or reasonable suspicion concern within 2 hours, no later than 8 hours, for alcohol, no later than 32 hours, for other substances.
C. Works with Contract Company representative or DER on removal of Contractors from safety sensitive duties following positive test results.
D. Notifies Director of Security of any drug and alcohol issues that impact security.
E. Submits CG-2892B form to USCG for a SMI test.

2.5. BP Director of Security

A. Receives notification from heliport security for reasonable suspicion testing.
B. Conducts investigation when individuals come forward with observations of improper or prohibited drug or alcohol related activities.
C. Manages personnel, bag and dog searches related to drug and alcohol.
D. Informed of Contractor positives to add to the No Access List.
E. Reviews Contractor program based on testing results.
F. Provide feedback and guidance on heliport suspicious substances and testing procedures.
G. For random and reasonable suspicion testing, works in coordination with Contract Company, BP offshore supervisior, OHN, and Drug and Alcohol collection vendors to assure testing is conducted timely, appropriately and accurately.

2.6. GoM Occupational Health Nurse (OHN)

A. Works with Contractor company DER on positive results and medication issues.
B. Point of contact for this Policy and the Medication Policy. Works with all parties to assure appropriate and accurate testing.
C. Verifies compliance with this Policy related to Contractor return to facilities or Company Projects following a prior positive test.

2.7. Medical Review Officer (MRO)

A. MRO will be unaffiliated with laboratory, not a BP employee, and a certified authority.
B. Reviews and reports verified drug test results as positive, adulterated, substituted, invalid, or failure to test.
C. Contacts Contractor for interview regarding a non-negative laboratory test.
D. Reports positive results to DER.
E. Reports concern regarding Dangerous and Restricted prescription medication that may interfere with safety sensitive duties to DER. Confirms that appropriate actions are underway before signing off.

2.8. Drug and Alcohol Testing Vendor

A. Understands the BP and GoM Drug and Alcohol Policies.
B. Completes drug and alcohol testing at designated locations (and maintains required records per regulations).
C. Disposes of illegal drugs.
D. Sends drug and alcohol test results to DER.
E. Liason with MRO and DER concerning test results.
F. Coordinates bag and dog searches as requested.
G. Provides drug and alcohol testing statistics as requested.

2.9. Health Manager

Serves as GoM Drug and Alcohol Policy authority.

3. General Requirements

3.1. Prohibited Drugs, Chemicals, and Medication

The use and possession of: alcohol, inhalants (eg. inhaled nitrous oxide, amyl nitrite, butyl nitrite, fluorinate hydrocarbons such as paint thinner, contact cement, nail polish remover, markers, whiteout, spray paint), illicit drugs and chemicals, illegal prescription medication, improperly used medication, recreational and medical marijuana are prohibited on Company premises, including all property owned, operated, leased by, or under the control of Company, as well as on the location of any authorized Company Project, regardless of the physical location where such work is performed. This includes sale, attempt to sell, purchase, transfer, distribution, concealment, transportation, or supply of these prohibited drugs, chemicals and medications. In many contracts, Company reserves the right to remove a Contractor's employees for any reason. In no way does this policy detract from that right.

Prohibited substances are defined as: (a) any alcoholic beverage, the use of which is not authorized by the Company, (b) any substance that an individual may not use, sell, possess, attempt to sell, purchase, transfer, distribute, transport, or supply under federal or applicable state laws, and (c) any otherwise legal but improperly or illicitly-used substances. "Otherwise legal but improperly or illicitly-used substances" include (a) prescription drugs obtained without proper medical authorization, and (b) prescribed drugs, over-the-counter drugs, and other substances not being used for their intended purposes or at intended dosage, and (c) illegal synthetic drugs. Drug paraphernalia and similar items used for substance abuse are likewise prohibited on Company Projects or premises. The report of use of food or dietary supplements (eg. hemp products, poppy seed) is not in itself, an acceptable excuse for positive drug tests.

The Medic, OHN, and Security shall be notified (or shall contact Supervisor or HR when the OHN or Medic are not available) if any prescription, non-prescription medication, or other substances are believed or determined to impair judgment or adversely impact safety or the ability to perform job functions.

3.2. Screening and Confirmation for Drugs and Alcohol

3.2.1. Drug Testing

The screening and confirmation cutoffs for drug testing are shown in the following tables.

Table 1. DOT Urine

Drug	Screening	Confirmation
Amphetamines	500 ng/ml	250 ng/ml
Cocaine	150 ng/ml	100 ng/ml
Codeine/Morphine/Heroin	10- 2000 ng/ml	10 - 2000 ng/ml
Synthetic Opiates	100 – 300 ng/ml	100 ng/ml
6-Acetylmorphine	10 ng/ml	10 ng/ml
Marijuana	50 ng/ml	15 ng/ml
MDMA/MDA	500 ng/ml	250 ng/ml
Methamphetamine	500 ng/ml	250 ng/ml
Phencyclidine (PCP)	25 ng/ml	25 ng/ml

Table 2. Non-DOT Urine 5 Panel (Noble CLIA Waived Drug Test Cup)

Drug	Screening	Confirmation
Amphetamines	1000 ng/ml	500 ng/ml
Cocaine	300 ng/ml	150 ng/ml
Extended Opiates	300 ng/ml	300 ng/ml
Marijuana	50 ng/ml	15 ng/ml
MDMA/MDA	1000 ng/ml	500 ng/ml
Methamphetamine	1000 ng/ml	500 ng/ml
Morphine	300 ng/ml	300 ng/ml
Phencyclidine (PCP)	25 ng/ml	25 ng/ml

Table 3. Oral Fluid

Drug Screen	Screening	Confirmation
Amphetamines	100 ng/ml	40 ng/ml
Cocaine	5 ng/ml	2 ng/ml
Extended Opiates	10 ng/ml	10 ng/ml
Marijuana	1 ng/ml	0.5 ng/ml
PCP	1 ng/ml	1 ng/ml

Table 4. Hair

Drug Screen	Screening	Confirmation

Amphetamines	5 ng/10mg	5 ng/10mg
Benzodiazepines	1 ng/10mg	0.2 ng/10mg
Cocaine	5 ng/10mg	5 ng/10mg
Marijuana	10 pg/10mg	1 pg/10mg
Opiates	2 ng/10mg	2 ng/10mg
PCP	3 ng/10mg	3 ng/10mg

A. Contractors will be tested onsite using rapid urine Point of Care Testing (POCT), or by oral fluid or hair.
B. DOT tests will be tested at a Substance Abuse and Mental Health Services Administration (SAMSHA) certified laboratory.
C. POCT, oral, and hair testing will be tested at an approved laboratory.
D. All laboratory non-negatives will undergo MRO review.

3.2.2. Alcohol Testing

A. Contractors will be tested using a breathalyzer(breath) or oral fluid screening tests.
B. In special circumstances, a blood test may be utilized for alcohol testing.
C. Screening alcohol tests which are positive at heliport will undergo confirmation testing using an evidential-quality breathalyzer for confirmation.
D. MRO review is not required for positive alcohol test results.
E. Contractors with positive alcohol tests at heliport will be asked to remain at testing location until Company DER is notified and advises regarding driving.

Table 3. Alcohol Screening and Confirmation

Screening Level	Confirmation and Consequences
Less than a 0.02% Breath Alcohol Concentration (BAC)	• a negative test result • fit for duty
For Contractors, any event equal to or greater than 0.02%	• Remove from active duty • Denial of access to any BP facility for a minimum of one year • To reapply for access, Contractor is required to demonstrate completion of a substance abuse program. A negative drug and alcohol test must be completed no greater than 30 days of applying for access.

3.3. Searches and Inspections

A. BP reserves the right at all times on its premises to conduct unannounced substance screens, searches, and inspections of Contractors, including their effects, lockers, baggage, desks, tool

boxes, clothing, and vehicles located on BP property or worksites, as a means of enforcing this Policy.

B. Any controlled substances or items prohibited by this Policy, or any materials that are illegal to possess, will be retained by BP and may be destroyed or turned over to the appropriate law enforcement agency. Suspicious substance will be retained to undergo further evaluation and drug and alcohol testing will be required of the Contractor in possession.

C. The refusal of any person to submit to a search,inspection, or required testing will result in the revocation of the person's access privileges.

3.4. Federally Regulated Testing following a Serious Marine Incident (SMI)

For GoM Region outer-continental shelf (OCS) facilities,

A. Alcohol testing will be conducted by the facility Medic as directed by the OIM or their designate within 2 hours following a SMI. If the situation does not permit the facility's Medic to conduct testing, then testing will occur onshore, unless the eight-hour time limit has lapsed.

B. Drug testing will occur within 8 hours, no later than thirty-two (32) hours, following a SMI. If circumstances preclude testing within the 32 hour timeframe, delayed testing may be considered for drugs only. SMI drug testing will be conducted by the facility Medic as directed by the OIM or their designate.

C. OHN will consult with Contract Company to facilitate Drug and Alcohol testing using a preferred vendor for Contractors at a hospital, clinic, Preservation Maintenance Facility, or Houma Operations Learning Center.

D. A USCG form CG-2692B, Report of Required Chemical Drug and Alcohol Testing Following a SMI, must be submitted to the USCG Chief of Investigations, Marine Safety Unit, Morgan City, LA, following any SMI by the OIM. The facility's Medic will maintain copies of this form for the facility.

3.5. Additional Federally Regulated Testing

Contractor Company is fully responsible for meeting federal drug and alcohol testing requirements. Contractors assigned to BP's Outer Continental Shelf (OCS) facilities may fall within the scope or authority of additional drug testing (other than SMI) regulations issued by the USCG (see references). These drug tests include pre-employment, random, reasonable cause, return to duty and follow-up tests. Alcohol testing may also be federally required when there is reasonable cause. When testing is required offshore on a BP facility, the Contractor DER will coordinate testing with the Medic under supervision of OHN. Examples of roles:

A. USCG Licensed Mariner Positions
   1) Offshore Installation Manager
   2) Ballast Control Officer
   3) Barge Supervisor (and alternate)

B. Unlicensed Positions
   1) Lifeboatman

2) Production Control Room Operator
3) Firefighting Specialist (and alternate)
4) Able Bodied Seaman (and alternate)
5) Ordinary Seaman

3.6. Violations

Any Contractor or vendor employee found to be in violation of this Policy shall, thereafter, be prohibited from entering Company premises and prohibited from working on any Company Project. Reinstatement of the access privilege may be made after one year upon request of the employing Contractor company as outlined in Section 4.7. Violations involving refusal to test are not eligible for reinstatement.

4. Process

Contractor programs shall include pre-employment, random, reasonable suspicion, and post-accident testing.

4.1. Pre-employment

Pre-employment testing is required before any Contractor may enter Company premises or perform work on any Company Project for the first time.

4.2. Random

Contractors are subject to random drug and alcohol testing at the BP heliport prior to offshore travel. Random testing rates are set by Company.

4.3. Post-accident

A. Non-federally regulated testing
   1) Following a work-related incident, the worker will be medically stabilized first and then may be required to submit to substance abuse testing.
   2) BP Supervisor or contract supervisor must assure that when an Contractor's conduct either contributed, or cannot be completely discounted as a contributing factor, to the accident/incident, that Contractor is tested for drugs and alcohol.
   1) If testing is not federally regulated as described below, testing shall be limited to situations where an Contractor's conduct either contributed, or cannot be completely discounted as a contributing factor, to the accident/incident.
   2) Documented explanation shall be required if alcohol testing does not occur within 2 hours following the incident. The worker is required to remain available for alcohol testing within the 8 hour time period.
   3) If the Contractor is a Licensed Mariner or holds a designated safety sensitive position, DOT/USCG post-accident testing will be conducted prior to non-federally regulated

testing

B. Federally regulated Serious Marine Incident testing (SMI)

1) Following a SMI, the Contractor will be medically stabilized first and then may be required to submit to substance abuse testing.
2) An OCS Casualty requires completion of USCG form CG-2692. An OCS casualty is defined on that form. A SMI requires completion of form CG-2692B, *Report of Mandatory Chemical Testing Following a Serious Marine Incident*. An SMI is defined on CG-2692B. If an OCS casualty has occurred that also results in a SMI, then drug and alcohol testing must be conducted and reported to the USCG.
3) BP Supervisor or contract company supervisor must verify that each Contractor who was directly involved is tested for drugs and alcohol. A "directly involved" individual is one whose order, action, or failure to act is determined to be, or cannot be ruled out as a causative factor in the events leading to or causing a SMI.
4) Documentation will be needed if alcohol testing does not occur within 2 hours following the incident. The Contractor is required to remain available for alcohol testing within the 8 hour time period.
5) A Serious Marine Incident SMI is defined as:
   a) One or more deaths
   b) An injury to a crew member, passenger, or other person that requires professional medical treatment beyond first aid, and , in the case ofa person employed on board a vessel in commercial service, which renders the individual unfit to perform routine vessel duties.
   c) Damage to property in excess of $100,000
   d) Actual or constructive loss of any vessel subject to inspection under 46 USC 3301
   e) Actual or constructive total loss of any self-propelled vessel, not subject to inspection under 46 USC 3301, of 100 gross tons or more
   f) Discharge of oil of 10,000 gallons or more into the navigable waters of the United States, as defined in 33 USC 1321
   g) A discharge of reportable quantity of hazardous substances into the navigable waters of the United States
   h) A release of a reportable quantity of hazardous substances into the environment.

C. Post-accident, testing is available from the BP facility Medic. The Contractor company representative will be notified prior to testing.

1) The OHN will notify a Contractor's Designated Employer Representative (DER) of the involved Contractor and testing requirements.
2) The Contractor DER's authorization is required for the facility's medic to test a Contractor.
3) If the Contractor's DER does not provide authorization, then Contractor will be responsible for arranging the testing of their employee, and the completion and submission of the required USCG form [see Sec 4.3(B)] following a SMI if applicable.
4) BP OHN may provide BP's preferred vendor information to the Contractor's DER.

D. Contractor will manage federally regulated testing for Contractor operated rigs, flotels, and vessels.

4.4. Reasonable Suspicion

A. Reasonable suspicion testing is performed based on a reasonable and particular belief that the Contractor is currently using prohibited drug or alcohol.
B. Reasonable suspicion testing must be based on specific, contemporaneous, physical, behavioral, or performance indicators of probable drug or alcohol use. For DOT covered Contractors, when possible, two Supervisors should substantiate and concur in the decision to test the Contractor.
C. The US Drug and Alcohol Misuse Policy has a Reasonable Suspicion Observation Checklist for Supervisors.
D. The OHN will contact the Contractor Company regarding reasonable suspicion concerns and testing of a Contractor.
E. The Contractor DER's authorization is required for the facility's medic to test a Contractor's employee.

4.5. Positive Tests

The following will be considered positive tests and considered a violation (Sec. 3.6) of this Policy.

A. MRO verified positive drug test where drug is identified above cut-off level without medical explanation.
B. Confirmation test above alcohol limit.
C. Refusal to test, failure to cooperate, or complete test.
D. An unexplained missed random or otherwise required alcohol and/or drug test.
E. Submission of a specimen that the MRO verifies as adulterated or substituted or evidence of an attempt to interfere with drug or alcohol test.
F. Contemporanous outside testing will not invalidate MRO verified positive drug tests.

4.6. Refusal to Test

The refusal of a Contractor to submit to any testing required by this Policy will result in revocation of the person's access privileges without opportunity for reinstatement. A refusal to test shall include a failure to cooperate with any part of the testing process, including:

A. failing to remain until the process is completed, or
B. failing to provide a sufficient or adequate specimen (without medical explanation), or
C. failing to appear for testing (including failing to appear within a reasonable time after being notified of testing), or
D. failing to submit to a re-collection or retesting when required, or
E. submitting a specimen that the MRO verifies as adulterated, substituted, or invalid due to test tampering.

4.7. Reinstatement

A. Any Contractor or vendor employee found to be in violation of this Policy shall, thereafter, be prohibited from entering BP premises and prohibited from working on any Company Project.

B. Reinstatement of the access privilege may be made after one year upon request of the employing Contractor company. Violations s involving refusal to test are not eligible for reinstatement Such requests should be made to the GoM Director of Security and will be evaluated on the merits of each case. A request will be granted only upon:

1. Receipt of evidence that the Contractor successfully passed a substance test conducted within not more than thirty (30) days prior to the date of the request.
2. Successful completion of a full assessment by a Substance Abuse Professional (SAP):
    i. For DOT/USCG positions, must be DOT certified SAP
    ii. For non-federally regulated positions, SAP must be:
        1. A licensed professional, and
        2. Have knowledge about and have clinical experience in the diagnosis and treatment of alchol and controlled substance-related disorders, and
        3. Have knowledge about return to work as it relates to employer interests in safety-sensitive duties.
3. Has complied with all recommended treatment,rehabilitation, and follow up testing prescribed by the SAP. As an example, a BP employee who has not been terminated is required to undergo at least 6 unnannounced follow up tests in the first 12 months.
4. If there are medical conditions accompanying the substance use, Contractor is expected to have been medically cleared by the appropriate physician.
5. Review of the report of the SAP and medical doctor by the BP OHN.

4.8. Heliport Amphetamine Letter

Random Point of Care (instant) Tests (POCT) at the heliport can not distinguish between prescription drugs Adderall or Vyvanse and illicit methamphetamine (“Meth”). Adderall or Vyvanse are considered Restricted medications according to the GoM Medication Policy (requiring doctors approval for offshore use).

These steps are highly recommended for Contract Companies to avoid delays in travel (due to non-negative drug tests) and assure offshore safety.

A. Contract employees notify Contract Company DER of use of Adderall or Vyvanse well in advance of travel offshore.

B. Contract Company DER contacts BP OHN for instructions.

C. Contract Company DER obtains medical clearance for use of a Restricted Medication offshore and returns documentation to BP OHN.
D. Contract Company DER sends a letter on company letterhead (contact OHN for letter template) to BP OHN and heliport collector company, containing:
    1. Name of Contractor, Identifier (badge number, date of birth), name of employer, name/signature of DER, date of letter, date of expiration of letter.
    2. Instructions to Heliport personnel in the event of a non-negative amphetamine result on a random Point of Care (instant) Tests (POCT).
    3. For medical confidentiality, the letter should not include personal medical details or names of medications.
E. Contract employee should carry a copy of letter and present to drug screen collection personnel at heliport.
F. Contract employee should notify offshore Medic of use of the Restricted Medication upon arrival offshore.
G. Prior to expiration of the letter, the Contractor should notify Contract Company DER, who should then send an updated letter to BP OHN to have on file

The heliport personnel will follow the instructions on the letter should the Contractor test non-negative for an amphetamine. If the drug test is conducted for any other reason than random (eg. for-cause with reasonable suspicion), the heliport amphetamine letter is not acceptable for travel.

4.9. Contractor Compliance Audits

A. GoM reserves the right to periodically audit a Contractor's or subcontractor's records to verify compliance with this policy. Such verification will include, but not be limited to:
    1. Examination of the Contractor's substance abuse policy and its implementing directives and procedures;
    2. A determination that substance testing is being conducted in those situations where it is required and that the testing meets the standards of this policy;
    3. Examination of chain of custody procedures which ensure integrity of collected specimens; or
    4. Evaluation of laboratory services.
B. Contractors and vendors shall submit a copy to BP of their drug and alcohol policy.

4.10 Statement of Confidentiality

It is the policy of BP that medical information, whether in verbal, written or electronic form, is considered strictly confidential. All such confidential information will be maintained in a confidential file separate from any other employee information. This information will only be disclosed to those with a legitimate "need to know." Contractors who disclose confidential medical information without proper authorization will be referred to their Contract Company.

5 Record Keeping

BP through its third party administrators and vendors will maintain records related to substance tests conducted under this Policy.

The results of substance tests performed by a Contractor or vendor or its employees assigned to work on GoM premises or on Company Projects must be disclosed to BP Management, Medical, and HR upon request, unless prohibited by federal, state, or local law.

6. Definitions/Acronyms

Drug Testing

Terms	Description
Adulterated	substances were found in a testing sample which are added after urination, intended to interfere with testing
Alcohol test	The analysis of urine, saliva, breath or blood for alcohol. Screening tests occur first, followed by, when available, evidential confirmation tests.
Alcohol positive	Positive alcohol screening and or confirmation tests. MRO review is not required.
Chain of custody	the combination of procedures and documentation which provides a faithful and accurate written record (Custody and Control form) of the custody of a biological specimen, from the time of initial collection of a specimen to final laboratory analysis.
Drug testing	the analysis of urine, saliva, hair, or blood for chemicals, drugs, and drug metabolites.
Invalid drug test	inability to complete laboratory testing due to interference of a substance which may be a medication, or other problems with the specimen
Laboratory positive drug test	laboratory confirmation of initial screening using sophisticated testing (eg. gas chromatography/mass spectrometry), prior to review by MRO.
Negative drug test	1. a negative Point of Care (instant) Test (POCT), or 2. laboratory conclusion that the presence of a substance was not detected in a specimen at or above the screening and confirmation levels utilized, or 3. MRO determinationi that a laboratory positive test had a legitimate explanation.
Non-negative drug test	the result of the Point of Care (instant) Test (POCT) or screening immunoassay conducted in a laboratory that was found to contain one or more substances present at or above the screening cut-off level, but has not yet undergone confirmatory testing at the laboratory and review by the MRO

Positive drug test (aka. verified positive drug test)	the final positive result after all confirmed laboratory testing is reviewed by MRO and the donor is interviewed without alternative medical explanation.
Post-accident	drug/alcohol testing following injury or property damage or as required by DOT post-accident testing
Refusal to Test	equivalent to a Positive drug test in this policy with the exception of reinstatement is not permitted for refusals
Serious Marine Incident testing	drug/alcohol testing following Serious Marine Incidents as defined by the USCG.
Substance abuse testing	Drug and Alcohol testing
Substituted	the specimen was not consistent with only human urine (eg. adding water to specimen)

7. Appendix

Frequently Asked Questions – Heliport Amphetamine Letter

ACTION: What do I need to do right now?
Are you taking Adderall or Vyvanse medication (or their generic versions)? For instructions to avoid delays in travel through the BP Heliport in Houma, you must contact the individual at your company responsible for drug testing. Contractors typically contact Human Resources at their company. BP employees contact BP Nurse.

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What is the Heliport Amphetamine Letter?
The letter permits an individual on a prescribed amphetamine to travel offshore despite a non-negative drug test for amphetamine at the heliport.

What amphetamines are permitted offshore?
Adderall and Vyvanse (or their generic versions) are prescribed for medical conditions related to attention and hyperactivity. These are considered Restricted medications offshore and should only be used if a physician has agreed they are safe for work offshore. Other prescription amphetamines are generally not safe offshore.

What happens if I don't have the letter?
If the individual does not have a letter on file at the heliport, they will not be permitted to travel offshore following a random non-negative drug test for amphetamines. The non-negative drug test sample is shipped to a laboratory where it is tested, then a doctor calls the employee to discuss the test results. The prescription is then verified with the prescribing doctor. This often takes 3 days, during which time the employee is unable to travel offshore. This occurs again each time you travel. Replacement workers may be sent instead.

Can I get a letter the same day I travel?
That is dependent on your company, doctor's office etc. Usually there is no way to get the letter in time for morning flights.

Does this permit illegal use of amphetamines and methamphetamine?
No, it does not allow illegal use. All prescriptions are eventually verified by a doctor. The laboratory testing can distinguish illegal drugs from prescription drugs, so eventually illegal drug use will be confirmed.

How do I get a heliport amphetamine letter?
BP employees should contact BP Nurse as soon as they are prescribed Adderall or Vyvanse. Contract employees should contact the individual at their company responsible for overseeing drug testing (often Human Resources). The prescription will be verified as legitimate and safe for use offshore by your company and your doctor. The heliport amphetamine letter created by your company and copies are sent to the BP heliport drug collection company and the BP nurse.

What will the letter say?
The letter will have your name, date of birth, expiration date of letter, and instructions to the heliport personnel. No personal medication or medical information should be on the letter.

Who should have a copy of the letter?
You should carry a copy. It is a good idea to take a picture with your phone should you misplace the letter. There should be a copy on file with: the individual at your company responsible for drug testing, the BP heliport drug collection company, and the BP Nurse. Be sure to notify the Medic upon arrival offshore that you take the Restricted medication.

Helliport FAQ Amphetamine Letter

Helliport%20FAQ%20Amphetamine%20L

8. References/Documents

BP (GOM) Drug and Alcohol Policy

BP (GoM) Medications Policy (Offshore)

BP Drug and Alcohol Misuse Policy (US)

http://hr.bpglobal.com/LifeBenefits/Assets/Documents/s/US-Drug--Alcohol-Misuse-Policy12-4-2014-(2).aspx

United States Coast Guard

Report of Marine Casualty, Commercial Diving Casualty, or OCS-Related Casualty

CG_2692.pdf

Report of Mandatory Chemical Testing Following a Serious Marine Incident Involving Vessels in Commercial Service CG-2692B

CG_2692B.pdf

Online resource: DOT Agency/USCG Drug and Alcohol Program Facts.
https://cms.dot.gov/sites/dot.gov/files/docs/DOT_Agency_USCG_Program%20Facts_A.pdf

Department of Transportation

DOT Random Testing Rates
https://www.transportation.gov/odapc/random-testing-rates

Procedures for Transportation Workplace Drug and Alcohol Testing Programs
https://www.transportation.gov/odapc/part40

SAMHSA

Certified Laboratories
http://www.samhsa.gov/workplace/resources/drug-testing/certified-lab-list

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Refer to GOO GoM Management of Change Procedure for list of critical documents and additional guidance.

Document Details			
Document Number	UPS-US-SW-GOM-HSE-DOC-00714-2	Revision	9
Document Title	Contractor Substance Abuse Policy		
Next Review Date	04/01/2021		
Reason for Issue: (check applicable)	☐ New ☒ Revise ☐ Supersede ☐ Obsolete		

Document Sign Off

	Print Name & Title	Signature	Date
Reviewer(s) (If not applicable, put N/A in front of Name & Title, then sign and date)	Valerie Murray		05/09/2019
	P Mark Glencross		05/09/2019
	Christine Curtis	DocuSigned by:	6/[illegible]/2019
	Diane Haines	2B85E1E415E94B8...	05/09/2019
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Communication Completed (If not applicable, put N/A in front of Name & Title, then sign and date)	N/A		05/09/2019
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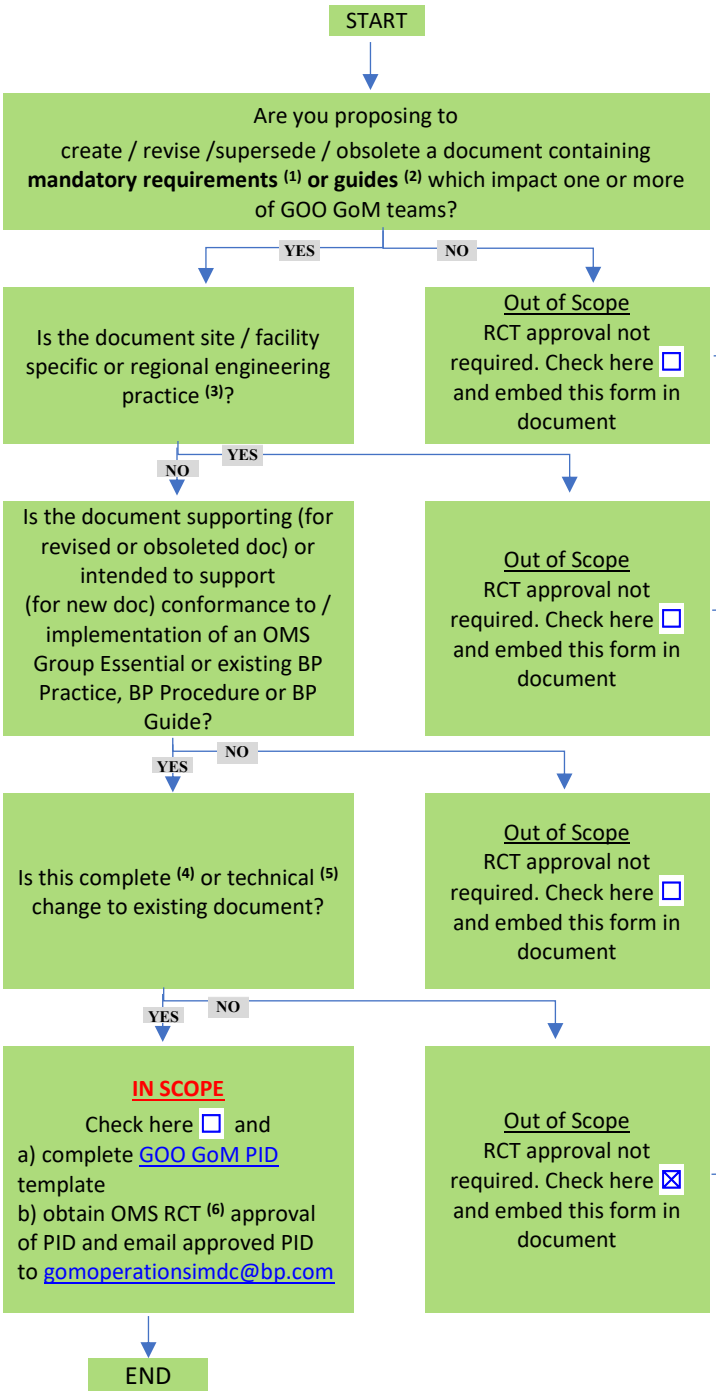
Embed evidence of training and communication in the document. This form to be inserted as the last page of the document.



(1) Mandatory requirements are: 'Shall', 'Must', 'Need to' or 'Required to' type statements.
(2) Guides containing 'Should' or 'Recommended that' type statements.

(3) E.g.: Site Operating Procedures (SOPs), Emergency Response Plans (ERPs), REP, Maintenance and Inspection documents.

(4) Complete - New or significant changes to existing document (incl. superseding, obsoleting) (5) Technical - Changes impact the intent of one or more requirements

(6) Identify GoM OMS RCT here. RCT approved PID needs to be emailed no later than two weeks before quarterly DGB Meeting to be considered for review. See DGB meeting schedule here.