



PACKAGING CORPORATION OF AMERICA CONTRACTOR DRUG & ALCOHOL RANDOM SCREENING PROGRAM (Excluding MINNESOTA Locations)

Purpose

PCA is committed to providing a safe work environment. Random screening for drugs and alcohol is a means by which to prevent impairment on the job site.

Scope

This program applies to all on-site contractors and subcontractors (each a “contractor”) and is required during all major outages as identified on the *PCA Corporate Major Outage Schedule*. This program may also be applied during other outages and capital projects as designated by location management.

Policy

All PCA Mill locations will conduct random drug and alcohol screening of on-site contractors and subcontractors.

PCA will continue to perform or request drug/alcohol testing if/when reasonable suspicion exists, or in the event of any industrial-related incident that causes property damage or injury, where there is indication that impairment may have caused or contributed to the incident.

Contractors shall not permit entry, and shall promptly remove from PCA property, any of Contractors’ personnel who test positive for drugs or alcohol. The individual removed shall be prohibited from working on any PCA project for a period of one (1) year from date of violation. Any further action regarding contractor personnel who are non-negative is at the sole discretion of the Contractor. Contractors must comply with all applicable local, state and federal laws with respect to any actions involving Contractor personnel participants and the implementation of this policy. The following results/actions will be treated as a “positive” test pursuant to this policy; non-negative screening without subsequent/confirmatory test, adulterated or attempting to adulterate or tamper with samples or results, causing any undue delay in submitting to a drug and/or alcohol test, or refusal to test (screening or confirmatory).

Random Selection Process & Notification

On each shift designated for screening, the random selection will be run from a master pool of all contractor personnel currently on-site.

Each Contractor must provide a designee for random drug and alcohol screening coordination (along with their contact information) to Mill EHS prior to arrival. That designee will be notified of selected screening contractor personnel participants. It is the Contractor Designee’s responsibility to notify their own personnel to report for screening and provide them all information to complete screening.

Contractor Company & Personnel Responsibility

Screening will be provided at time and location to be announced by PCA site management. Individuals selected for testing must report to the screening location during the indicated screening times.

If any individual is not able to complete the drug and alcohol testing within the designated time, they will be required to leave the mill property. If alternative arrangements are needed, it is the Contractor Company Designee’s responsibility to contact Mill EHS as soon as possible. Any delays or increases in cost related to Contractor’s work and/or services for PCA as a result of the removal of contractor personnel due to a non-negative test or failure to complete testing shall be borne solely by the Contractor and no extensions to Contractor’s time to complete its work or services to PCA shall be granted.

Screening & Results

The screening devices used will be STATSWAB rapid oral fluid test for drugs and QED Saliva Test for alcohol. These typically provide results within 15 minutes. The drug screen is positive or negative for each drug tested. The alcohol screen is a semi-quantitative test that will give an estimated blood alcohol concentration. PCA will require lab-certified subsequent/confirmatory urine testing on all non-negative rapid drug screen results.



Each contractor personnel will be asked to provide photo ID and sign a consent agreement for screening (see Appendix A). Participating contractor personnel should not eat or drink for 10 minutes prior to screening and will be asked to wait if needed.

The PCA location must retain a copy of all non-negative results or refusals for a period of six years. All consent forms (regardless of testing results) shall be retained for a period of six years. Each contractor personnel participant will receive a copy of their result at time of testing and a copy of the results will be provided to the participant's employer.

SWABII-0108 10-Panel STATSWAB II NO THC (AMP/BAR/BZO/COC/MAMP/MDMA/MTD/OPI/OXY/PCP)
 31150C QED® Saliva Alcohol Test * DOT APPROVED - CLIA WAIVED*

STATSWAB Instant Cut-Off Levels		
Drugs of Abuse	Abbreviation	Oral Fluid (ng/mL)
Amphetamine	AMP	50
Barbiturates	BAR	300, 20
Benzodiazepines	BZO	50, 30
Cocaine	COC	50, 20
Ecstasy	MDMA	100, 50
Methamphetamine	MAMP	50
Methadone	MTD	75, 30
Opiates/Morphine	OPI/MOR	50, 40
Oxycodone	OXY	50, 20
Phencyclidine	PCP	10
QED Alcohol Saliva Test		
Alcohol		0.00 - 0.15% BAC

Drugs of Abuse Matrix - Micro-Distributing

- ❖ Participants with both a negative drug screen result & a negative alcohol screen result (0.00% BAC) will be permitted to return to work.
- ❖ **If the results of the STATSWAB rapid drug screen are non-negative:**
 1. The Contractor Company Designee will be notified immediately.
 2. Upon participant consent, a subsequent/confirmatory urine sample must be collected/sent to a certified lab (ie BlueLine) for testing as soon as possible. Collections will be completed or coordinated by Mill Health Services/EHS.
 3. The contractor personnel must be removed from the facility/property by the Contractor as soon as possible, pending confirmatory test results.
 4. Refusal to submit to confirmatory testing will result in immediate removal and one (1) year ban from PCA. See also Appendix C.
- ❖ **If the results of the alcohol screen are non-negative (above 0.00% BAC):**
 1. The Contractor Company Designee will be notified immediately.
 - **0.010% BAC – 0.019% BAC:** After Contractor consultation with Mill EHS, an individual *may* be permitted to work in the absence of any sign(s) of impairment.
 - **0.020% BAC – 0.079% BAC:** The individual must be removed from PCA property immediately. The individual will be permitted to return and work after a minimum of 24 hours from positive test and only upon subsequent negative result on follow-up test to be collected at time of re-entry.
 - **0.080% BAC and above:** The individual must be removed from PCA property immediately and prohibited from working on any PCA project for a period of (1) year from violation.



Prescription Drugs

It is an individual worker’s responsibility and obligation to determine, in consultation with their licensed healthcare provider, whether a legal drug they are taking may or will affect their ability to perform their job duties safely and efficiently. An individual taking legal drug(s) whose impairment may affect job safety and/or performance must notify their designated supervisor for further instruction.

For an individual who is lawfully taking prescription medications as directed by their licensed healthcare professional; all certified lab test results are verified by a Medical Review Officer (MRO) – a licensed Physician who is additionally trained & certified in substance testing. The Medical Review Officer will contact the donor of any positive sample to discuss the results. If the Medical Review Officer determines there is a legitimate medical explanation for a lab-confirmed positive test result, they may report the final result to PCA as negative. However, the Medical Review Officer may note on the results that there is a safety concern. All workers should be aware that they are not permitted to work while under the influence of prescription medications that affect the safe work environment.

Subsequent/Confirmatory Testing

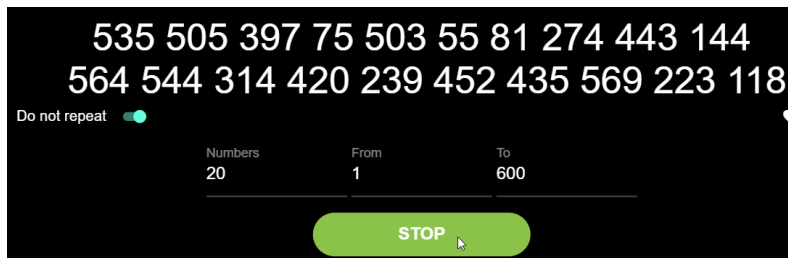
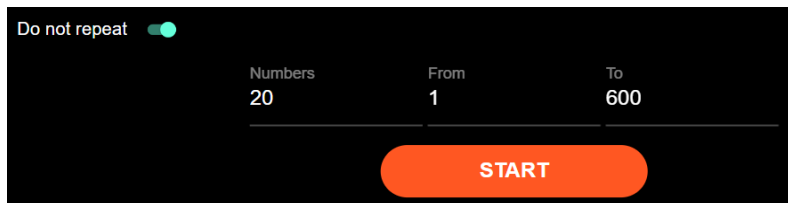
PCA will require lab-certified subsequent/confirmatory urine testing on all non-negative rapid drug screen results. This subsequent/confirmatory testing will be coordinated and paid for by PCA. Results of the subsequent/confirmatory test will be sent to the Contractor’s Company Designee. Please be aware that results may take up to several days. It is PCA’s intent that an individual and/or Contractor be minimally impacted by this process and therefore, individuals who receive negative subsequent/confirmatory results (without a noted safety concern by the Medical Review Officer) may submit with their Contractor and appropriate PCA agent, the appropriate scheduled work hours to be invoiced for payment while test results were pending, so long as the individual responds to contact from the Medical Review Officer within 24 hours.

For PCA personnel only:

Once a numbered, master list of contractor personnel currently on-site has been generated, follow the steps below for random selection.

Using [Random Number Generator](#) (Ctrl+Click to open link):

1. Toggle the “Do not repeat” switch to **ON** (will display in green).
2. For the field “Numbers” enter the number of tests required for the current test session.
3. For the field “From” always enter the number “1”
4. For the field “To” always enter the total number of contractors **currently** on site, based on the master list.
5. Once all fields entered, select “Start” and then “Stop” at random.
6. The names on the master list that correspond to the numbers generated, are the randomly selected contractors to be screened.
7. New master lists and random numbers should be generated each day/shift.





Appendix A

ACKNOWLEDGMENT OF RECEIPT OF POLICY AND CONSENT TO TESTING

I certify that I received, reviewed, and understand Packaging Corporation of America's Contractor Drug & Alcohol Random Screening Program policy, and any applicable State Supplement(s) (the "Policy"). I agree to comply with the Policy and understand that failure to comply is grounds for immediate removal from PCA facilities or locations.

I consent to submit to drug and/or alcohol testing as requested or required by Packaging Corporation of America and as outlined in the Policy. I consent to provide specimens at the assigned collection site and certify that those specimens are my own and have not been substituted or adulterated. I consent to the release of the drug and/or alcohol screen/test results on tests requested or required by Packaging Corporation of America and as outlined in the Policy, including disclosure of the results to my employer.

Contractor Personnel Name:		Date:	
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Contractor Personnel Signature:	
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Contractor Company Name:	
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PCA Personnel: Retain this document for a period of six years.



Appendix B

Specimen ID # _____



Preliminary Drug Screen Result Form

Company Information

Company Name: _____
Address: _____
Phone: _____

Donor Information

Donor Name: _____ ID#: _____

Test Information

Reason for Test: [] Pre Employment [x] Random [] Post Accident [] Reasonable Suspicion [] Periodic
Date of Collection: _____ Time of Collection: _____ AM / PM
Specimen Type: [x] Oral Fluid [] Urine Temperature 90 - 100° F : [] YES [] NO [x] N/A
Test Lot #: _____ Remarks: _____
Expiration Date: _____

Preliminary Test Results

- [] Negative for all
[] Positive for the drugs marked:
[] Marijuana -THC
[] Opiate-Morphine - OPI/MOR
[] Amphetamine - AMP
[] Barbiturates - BAR
[] Methadone - MTD
[] Tricyclics-TCA
[] Propoxyphene - PPX
[] Buprenorphine - BUP
[] Alcohol (ALC)
[] Cocaine - COC
[] Methamphetamine - mAMP
[] Phencyclidine - PCP
[] Benzodiazepine - BZO
[] Ecstasy-MDMA
[] Oxycodone - OXY
[] Tramadol (TRA)
[] Fentanyl (FTY)
[] Alcohol (ETG)

Remarks: (eg. specimen integrity checks) _____

QED Alcohol Swab Test Result

- [] Negative: 0.00 %
[] Positive: 0.01% - 0.019%
[] Positive: 0.02% - 0.079%
[] Positive: 0.08% or above
Test Lot Number: _____
Expiration Date: _____

I certify that I collected the specimen provided by the aforementioned donor and that it was not substituted or adulterated to the best of my knowledge.

Collector Signature: _____ Date: _____

*Please note this is a rapid-screen result and is not a lab-certified test.



Appendix C

REFUSAL TO CONSENT/COMPLY

Upon refusal to consent/comply to drug and/or alcohol random screening conducted or coordinated by Packaging Corporation of America, the Contractor Company Designee must be notified to immediately remove the individual from PCA property for a period of one (1) year from the date of this refusal. Refusal includes, pursuant to PCA's Contractor Drug & Alcohol Random Screening Program policy:

- Refusal to submit to rapid drug and/or alcohol screening
- Refusal to submit to subsequent/confirmatory urine testing if a non-negative rapid drug screen is obtained
- Causing any undue delay in submitting to a drug and/or alcohol test
- Tampering with or attempting to tamper with the drug and/or alcohol testing process including adulteration of specimen

I certify that I have received, reviewed, and understand Packaging Corporation of America's Contractor Drug & Alcohol Random Screening Policy, and any applicable State Supplement(s) (the "Policy"). I hereby refuse to comply with the Policy and understand that failure to comply is grounds for immediate removal from PCA property for a period of one (1) year from this refusal.

Contractor Personnel Name:		Date:	
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Contractor Personnel Signature:	
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Contractor Company Name:	
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PCA Personnel: Retain this document for a period of six years.

PCA Personnel: If an individual refuses to sign this Refusal to Consent/Comply, document the refusal by noting the Contractor Personnel's Name, the date, the name of the PCA personnel involved, and signature of the PCA personnel involved.



Appendix D

NON-NEGATIVE RESULTS DOCUMENTATION FORM

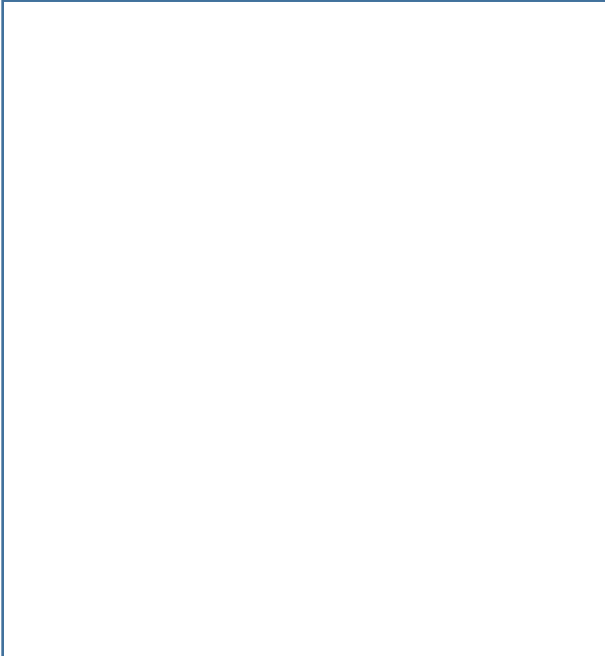
Please insert photo image of screening device that shows the non-negative result(s) and attach this form to *Preliminary Drug Screen Result Form* (Appendix B) for filing with a retention period of six years.

Photo images must be taken within the acceptable read times according to the device manufacturer's instructions.
SWABII-0108 10-Panel STATSWAB II NO THC (AMP/BAR/BZO/COC/MAMP/MDMA/MTD/OPI/OXY/PCP)
Read Time: After 10 minutes, but not after 1 hour

31150C QED® Saliva Alcohol Test * DOT APPROVED - CLIA WAIVED*
Read Time: After 2 minutes, but not after 5 minutes

Non-negative Drug Screen Results Follow Up:

2. The Contractor Company Designee must be notified immediately.
3. Upon participant consent, a subsequent/confirmatory urine sample must be collected/sent to a certified lab (ie Blueline) for testing as soon as possible. Collections will be completed or coordinated by Mill Health Services/EHS.
4. The contractor personnel must be removed from the facility/property by the Contractor as soon as possible, pending subsequent/confirmatory test results.
5. Any further action regarding contractor personnel who are non-negative is at the sole discretion of the Contractor.
6. Refusal to submit to subsequent/confirmatory testing will result in immediate removal and one (1) year ban from PCA. See Appendix C for Refusal to Consent Form.



Non-negative Alcohol Screen Follow Up: (above 0.00% BAC):

1. The Contractor Company Designee will be notified immediately, and:
 - **0.010% BAC – 0.019% BAC:** After Contractor consultation with Mill EHS, an individual *may* be permitted to work in the absence of any sign(s) of impairment.
 - **0.020% BAC – 0.079% BAC:** The individual must be removed from PCA property immediately. The individual will be permitted to return and work after a minimum of 24 hours from positive test and only upon subsequent negative result on follow-up test to be collected at time of re-entry.
 - **0.080% BAC and above:** The individual must be removed from PCA property immediately and prohibited from working on any PCA project for a period of (1) year from violation.

Collector Name:		Date:	
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PCA Personnel: Retain this document for a period of six years.