Indiana Utility Regulatory Commission Pipeline Safety
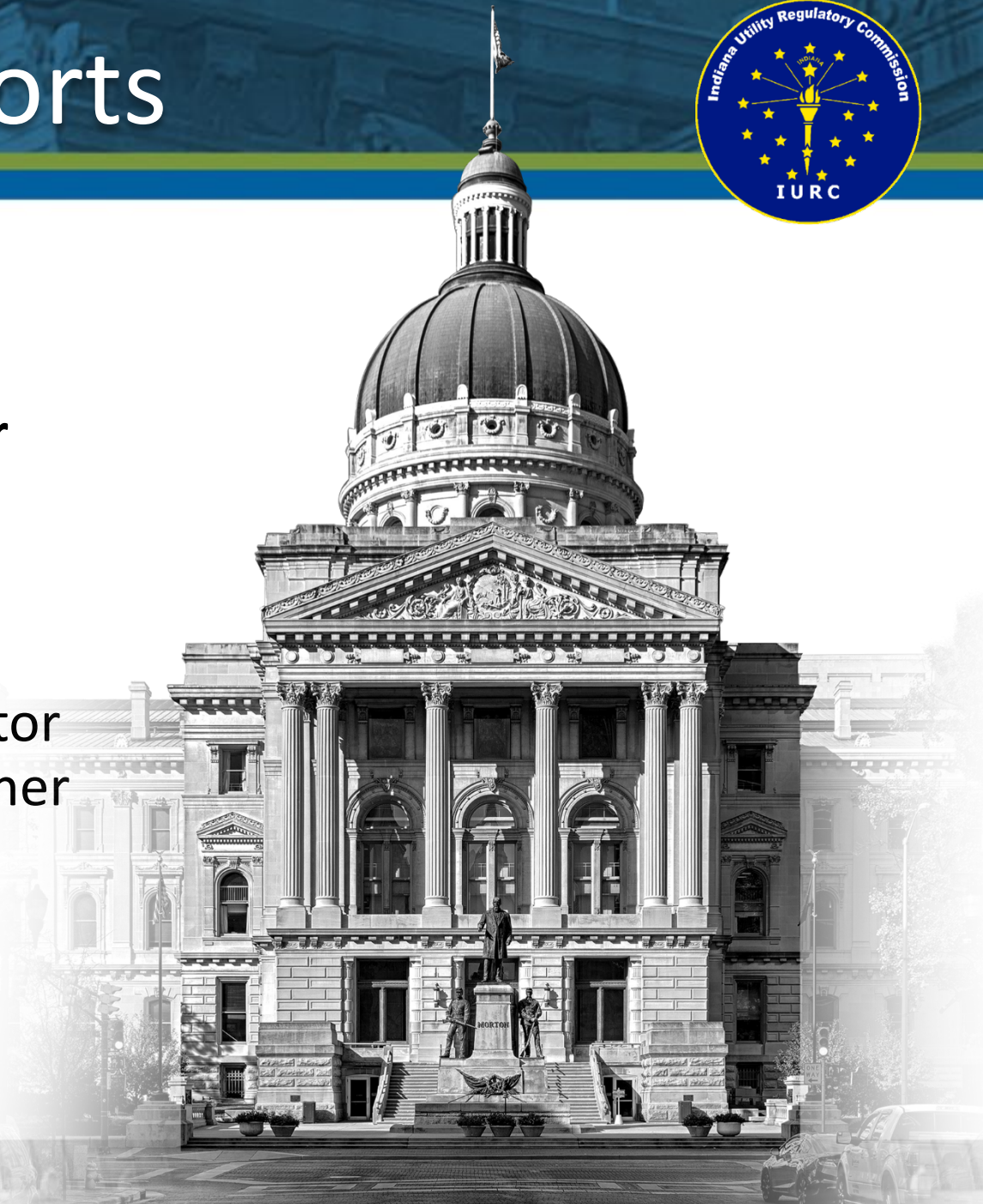
Covered Employees

PHMSA Considers operators with 50 or fewer COVERED Employees as a small operator.

While contractor employees are covered employees requiring D&A testing, contractor employees are not used to calculate whether an operator is a large or small operator. Therefore, do not include contractor employees in this calculation.

Drug and Alcohol Reports

IF YOU ARE A MEMBER OF A CONSORTIUM

If your covered employees are in a random drug testing pool managed by a consortium, count only your own covered employees.

Drug and Alcohol Reports

- If you have employees subject to D&A testing under more than one DOT agency, count only those employees who were drug and/or alcohol tested under PHMSA, as shown on the Federal Drug Testing Custody and Control Form (CCF)

- If the total number of covered employees is more than 50, a D&A MIS report is required.

In late December each year, your online reporting username and password are available in the PHMSA Portal – https://portal.phmsa.dot.gov/pipeline.

• **PHMSA Portal Users**

- Registered PHMSA Portal users for an operator typically include your compliance officer and staff or consultants with responsibility for submitting your reports.

- For operators without any staff registered in the PHMSA Portal, the operator person responsible for submitting MIS reports can register in the Portal at:

https://portal.phmsa.dot.gov/phmsapub/faces/enrollmentv2.ispx.

- **Instructions are located at:**

https://portal.phmsa.dot.gov/phmsaportal2staticcontentredesign/howto/portalaccountcreation.pdf

Drug and Alcohol Reports

MIS Reports for 50 or fewer Employees

- **PHMSA D&A MIS report is only required if you receive a "written notice" from PHMSA requesting a report.**

- **PHMSA transmits a "written notice" as a message in the PHMSA portal in late December each year. – https://portal.phmsa.dot.gov/pipeline.**

MULTIPLE OPID NUMBERS

- Each operator must inform PHMSA through PHMSA's National Registry as to whether the D&A testing program applies to one OPID or multiple OPID's. You must establish the "primary OPID" which "owns" the D&A testing program and is responsible for submitting annual D&A MIS reports. Once the primary OPID has been decided this notification establishes a Safety Program Relationship. (SPR)

- The primary operator in the PHMSA database reports the annual D&A test data in the DOT's D&A MIS commonly referred to as DAMIS.

- Report the additional submitting OPID's listed in the PHMSA SPR database as a "Business Unit" in DAMIS. Yes, a submitting OPID is a Business Unit.

MULTIPLE OPID NUMBERS

- Safety Program Relationship (SPR) primary and submitting operator data is maintained in a PHMSA database and the D&A MIS tests data is maintained in the DOT DAMIS database. <u>These are two separate and distinct databases that are not linked. You must update both.</u>

- It is important to understand the term <u>"business unit" is unique to the DOT DAMIS database.</u>

- To ensure PHMSA collects complete pipeline D&A test data, you must submit a single MIS report that includes D&A data for the primary OPID and the business units.

Contractors

1) PHMSA must identify all the contractors who perform D&A covered functions for a specific pipeline operator.

2) PHMSA must identify all the pipeline operators for whom a specific contractor performs D&A covered functions.

3) PHMSA must have complete D&A test data for each contractor submitting an MIS report.

CONTRACTORS

- DOT uses a Business Tax Identification Number (BTIN) rather than a OPID to track contractors in the DAMIS database.

- A contractor may perform D&A covered functions for multiple operators.

- Each contractor must prepare a single and complete MIS report that includes all D&A covered employees and all D&A test data for the BTIN. This single and complete MIS report is then attached to the appropriate primary OPID report.

- This contractor MIS report does not imply that all the contractor employees listed worked on the operator's pipeline. It simply allows PHMSA to identify all the contractors working for a reporting pipeline operator.

- If a contractor worked for 20 operators, that contractor will have 20 identical MIS reports submitted by the operators.

INDIANA UTILITY REGULATORY COMMISSION

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