



Policy Area	FAA	FMCSA	FRA	FTA	PHMSA	USCG
Safety Sensitive Position	Flight crew member, flight attendants, flight instructors, air traffic control, aircraft dispatch, aircraft maintenance, preventative maintenance, aviation screening, ground security coordinator	Commercial Driver License Holders	Varies with Hours of Service Act Employees -1, 2, 3: Engine, train & signal services, dispatchers, operators	Vehicle Operators, Controllers, Mechanics, and Armed Security Personnel	Operations, Maintenance, and Emergency Response Personnel	Crew Members on board a commercial vessel
Type of Test (Drug)	Pre-employment, Random, Post Accident, Reasonable Cause, Return-To-Duty, & Follow-up	Pre-employment, Random, Post Accident, Reasonable Cause, Return-To-Duty, & Follow-up	Pre-employment, Random, Post Accident, Reasonable Cause, Return-To-Duty, & Follow-up	Pre-employment, Random, Post Accident, Reasonable Cause, Return-To-Duty, & Follow-up	Pre-employment, Random, Post Accident, Reasonable Cause, Return-To-Duty, & Follow-up	Pre-employment, Random, Serious Marine Incident, Reasonable Cause, Periodic (with a required physical exam under USCG Regulations)
Type of Test (Alcohol)	Random, Post-Accident, Reasonable Cause, Return-To-Duty, Follow-up, Pre-employment (optional)	Random, Post-Accident, Reasonable Cause, Return-To-Duty, Follow-up, Pre-employment (optional)	Random, Post-Accident, Reasonable Cause, Return-To-Duty, Follow-up, Pre-employment (optional)	Random, Post-Accident, Reasonable Cause, Return-To-Duty, Follow-up, Pre-employment (optional)	Random, Post-Accident, Reasonable Cause, Return-To-Duty, Follow-up, Pre-employment (optional)	Random, Serious Marine Incident, Reasonable Cause, Return-To-Duty, Follow-up, Pre-employment (optional)
Random Percentage	Drug:25% Alcohol: 10%	Drug:50% Alcohol: 10%	Drug:25% Alcohol: 10%	Drug:25% Alcohol: 10%	Drug:25% Alcohol: N/A	Drug:50% Alcohol: N/A
Pre-Duty Use Prohibition	No alcohol 8 hours before flight: Crew members, Attendants, & Air Traffic Control - No Alcohol 4 Hours prior to shift: flight instructors, aircraft dispatcher, aircraft maintenance, ground security coordinator, preventative maintenance, aviation screening.	No alcohol within 4 hours prior to shift.	No alcohol within 4 hours prior to shift, except 4 hours called for unscheduled assignments.	No alcohol within 4 hours prior to shift.	No alcohol within 4 hours prior to shift. Unless, in an emergency and the employee is the only qualified person in the area.	No alcohol within 4 hours prior to shift.
BAC .02 - .039	Return-to-duty with re-test less than .02 or 8 hours off duty following the initial test.	Minimum of 24-hour removal from duty	Minimum 8-hour removal from duty	Return-to-duty with re-test less than .02 or 8 hours off duty following the initial test.	Return-to-duty with re-test less than .02 or 8 hours off duty following the initial test.	Alcohol tests must be conducted within two hours after a serious marine incident, unless precluded by safety concerns related to the incident. All commercial vessels must be equipped with alcohol testing devices on board. Approved NHTSA Saliva testing devices are acceptable. If an alcohol test cannot be conducted because of safety concerns, the cut-off to conduct the test is 8 hours following the incident.
Immediately remove the employee from safety sensitive duties for consequences of alcohol violations with a BAC .04 and above, non-negative drug test, refusal to test, or return-to-duty requirements.	Referral to a SAP - comply with the recommended treatment plan & have a negative return-to-duty test before returning to a safety sensitive position. After 2 non-negative tests, the employee is barred from performing the same duty for any employer. For Airmen, refusals may result in loss of certificate. Medical Certificate holders must be cleared by a Federal Air Surgeon before returning to duty. The Federal Air Surgeon must be notified within two days of the violation.	Referral to a SAP - comply with recommended treatment plan & have a negative return-to-duty test before returning to a safety-sensitive position.	Referral to a SAP - comply with recommended treatment plan & have a negative return-to-duty test before returning to a safety sensitive position. Regardless of the SAP treatment plan, FRA requires negative return-to-duty testing and follow up testing.	Referral to a SAP - comply with recommended treatment plan & have a negative return-to-duty test before returning to a safety-sensitive position.	Referral to a SAP - comply with recommended treatment plan & have a negative return-to-duty test before returning to a safety-sensitive position.	Drug use must be reported for license holders and there is a mandatory loss of license and/or papers with hearing. For alcohol, civil penalty of \$1,000 for .04 or greater on a commercial vessel. Additional penalties up to \$250,000 penalty and one year in jail.