

October 21, 2002

We have reviewed the proposed changes for the Management Information Systems reporting form and have made the following determinations:

Data Elimination: The elimination of Data on the proposed (MIS) form will greatly enhance the efficiency and we believe, the accuracy of reported statistical data as it pertains to Part 40. When discussed by our officers, one objection was made to the "total elimination" of supervisory data. All operating agencies require that some supervisory personnel be trained in recognizing the signs/symptoms of drug and alcohol misuse. We believe that to totally eliminate the supervisory requirements might serve to de-emphasize the importance of such individuals. We suggest changing the portions that required supervisor initial training data to a more informative/pertinent category titled "number of employed supervisors who have received training".

The idea of bringing uniformity to the way each agency totals the number of employees for the applicable periods was well received. The proposed method for handling cancelled tests/refusals will bring a needed delineation to reporting requirements. It was also agreed that the refusal subcategories add a certain clarity to the report.

Our greatest concern, with reporting usually lies in contractor monitoring. Many large companies often contract with outside sources to verify/assure compliance of subcontractors. This results in a huge workload as each private monitoring company requests different information. It is not unusual that these private monitors request too much or too little information. We maintain that information not contained on the MIS form should not be required by third party auditors and that companies who refuse to provide excess private information not be assigned "out of compliance", "unacceptable", or "unsatisfactory" designations with these companies. For DOT regulated companies, this amounts to an extra, unnecessary "regulatory" burden.