

Inspection Output (IOR)

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Inspection Information

Inspection Name	Lamb Weston D&A (ID 8219)	Operator(s)	LAMB WESTON/BSW (32560)	Plan Submitted	10/29/2020
Status	PLANNED	Lead	Scott Anderson	Plan Approval	11/24/2020 by Joe Subsites
Start Year	2020	Lead+		All Activity Start	10/28/2020
System Type	DA	Team Members	Scott Rukke, David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrrough, Derek Norwood, Darren Tinnerstet	All Activity End	11/19/2020
Protocol Set ID	DA.2020.01	Observer(s)	Deborah Becker, Rell Koizumi	Inspection Submitted	--
		Supervisor	Joe Subsites	Inspection Approval	--
		Director	Sean Mayo		

Inspection Summary

Inspection Scope and Summary

This inspection consisted of a review of records and procedures of the Lamb Weston Drug & Alcohol Plan. Lamb Weston uses 3rd party vendor Northwest Drug-Safe as their drug and alcohol testing and educating facility.

Summary of Significant Findings

No significant findings

Primary Operator contacts and/or participants

Marvin Price, Lamb Weston/BSW, Manager Energy & Environmental

Eric Larson, NW Metal Fab, Gas Maintenance Supervisor

Operator executive contact and mailing address for any official correspondence

Andy Bateman

Lamb Weston/BSW

Plant Manager

1203 Basin St.,

Warden, Washington 98857

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	Drug & Alcohol	Lamb Weston	unit	86294	--	40	40	40	100.0%

1. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	Drug & Alcohol	n/a	DA	P, R, O, S	Detail	

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date End Date	Focus Directive s	Involved Groups/Subgroup s	Asset s	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	Lamb Weston D&A	--	10/28/2020 11/19/2020	n/a	all planned questions	all assets	all types	40	40	40	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.
2. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Lamb Weston D&A	COMPLETED	11/17/2020	Lamb Weston D&A	Drug & Alcohol

Results (all values, 40 results)

DA.GENERAL: General Program Requirements

1. Question Result, ID, References **Sat, DA.GENERAL.DER.R, 40.3 (40.15(d), 40.355(k))**
 Question Text *Has the operator appointed a company employee as the Designated Employer Representative (DER)?*
 Assets Covered **Drug & Alcohol**
 Result Notes **Marvin Price is the DER for Lamb Weston. Page 18 under Informational Resources. No issues**
2. Question Result, ID, References **Sat, DA.GENERAL.SERVICEAGENTOVERSIGHT.P, 40.11(b) (40.11(c), 40.15(c), 40.341(a), 40.355(a), 40.355(m), 40.355(n))**
 Question Text *Does the process ensure the operator remains responsible for the actions of all its service agents, including a Consortium/Third Party Administrator (C/TPA)?*
 Assets Covered **Drug & Alcohol**
 Result Notes **Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan, Page 1, Purpose and Policy Statement para. 3**
3. Question Result, ID, References **Sat, DA.GENERAL.COVEREDEMPLOYEES.P, 199.3 (199.1, 40.347(b)(2))**
 Question Text *Does the process result in the proper and complete identification of covered employees and the exclusion of non-covered employees?*
 Assets Covered **Drug & Alcohol**
 Result Notes **Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan, "Employees Subject to Testing" Section, page 2. "The Company shall not falsely represent..." Page 3. "The test request form and non-DOT alcohol testing form..." page 10. Appendix B page 25.**
4. Question Result, ID, References **Sat, DA.GENERAL.PREVIOUSEMPLOYERRECORDS.P, 40.25(a) (40.25(b), 40.25(c), 40.25(d), 40.25(e), 40.25(f), 40.25(g), 40.27, 40.321(b), 40.351(d))**
 Question Text *Does the process include previous employer DOT D&A record checks for employees seeking to perform covered functions for the first time (i.e., a new hire or an employee transferring into a safety-sensitive position)?*
 Assets Covered **Drug & Alcohol**

- Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan, "Inquiries into Drug/Alcohol Testing Histories" section, page 5](#)
5. Question Result, ID, References [Sat, DA.GENERAL.NONDOTTESTS.P, 40.13\(a\) \(40.13\(b\)\)](#)
 Question Text *Does the process separate and prioritize DOT drug and alcohol testing over all non-DOT drug and alcohol testing?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan, Appendix C, A\(2\)](#)
6. Question Result, ID, References [Sat, DA.GENERAL.CONTRACTOROVERSIGHT.P, 199.115 \(199.115\(a\), 199.115\(b\), 199.245\(a\), 199.245\(b\), 199.245\(c\)\)](#)
 Question Text *If a contractor performs covered functions on the pipeline and is allowed to have its own D&A Programs, does the process ensure the contractor fully complies with Parts 199 and 40?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan, Procedures for Determining Compliance, last paragraph page 18.](#)
7. Question Result, ID, References [Sat, DA.GENERAL.MISREPORTS.R, 199.119\(a\) \(199.3, 199.119\(f\), 199.229\(a\), 199.229\(d\), 40.26\)](#)
 Question Text *Does the process ensure D&A MIS reports are submitted annually to PHMSA as required?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan, MIS Reporting section. Lamb Weston has less than 50 employees and is not required to submit annual reports.](#)

DA.DRUG: Anti-Drug Program

8. Question Result, ID, References [Sat, DA.DRUG.PLAN.P, 199.101\(a\) \(199.101\(a\)\(1\), 199.101\(a\)\(2\), 199.101\(a\)\(3\), 199.101\(a\)\(4\)\)](#)
 Question Text *Is a written Anti-Drug Plan in-place and maintained that conforms to the requirements of Part 199 and Part 40?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan, Introduction, page 1.](#)
9. Question Result, ID, References [Sat, DA.DRUG.SERVICEAGENTQUAL.R, 199.5 \(199.107\(a\), 199.109\(b\), 40.33, 40.81\(a\), 40.121, 40.281\)](#)
 Question Text *Do records indicate that Anti-Drug program positions and/or service agents meet the applicable qualification requirements of Part 40 and Part 199?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [See attachments for qualified agents taking specimens.](#)
10. Question Result, ID, References [Sat, DA.DRUG.PROHIBITEDDRUGS.P, 199.3 \(40.3\)](#)
 Question Text *Does the process require that DOT drug tests are only conducted for the "prohibited drugs" specified in Part 40?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Substances for Which Testing Must be Conducted". Page 5](#)
11. Question Result, ID, References [Sat, DA.DRUG.PREEMPLOYMENT.P, 199.105\(a\) \(199.105\(c\)\(5\)\)](#)
 Question Text *Does the process require that no individual is allowed to perform a covered function unless that individual passes a drug test or is covered by an anti-drug program that conforms to Part 199?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Pre-employment Drug Testing". Page 5](#)
12. Question Result, ID, References [Sat, DA.DRUG.POSTACCIDENT.P, 199.105\(b\) \(199.117\(a\)\(5\), 40.355\(g\), 40.355\(h\)\)](#)
 Question Text *Does the process ensure that post-accident drug testing is conducted as required?*
 Assets Covered [Drug & Alcohol](#)

- Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Post-accident Drug and Alcohol testing". Pages 7-8](#)
13. Question Result, ID, References [Sat, DA.DRUG.RANDOM.P, 199.105\(c\)\(5\) \(199.105\(c\)\(6\), 199.105\(c\)\(7\), 199.105\(c\)\(8\), 199.105\(c\)\(9\)\)](#)
 Question Text *Does the process ensure that random drug testing is conducted as required?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Random Drug Testing". Page 6](#)
14. Question Result, ID, References [Sat, DA.DRUG.REASONABLECAUSE.P, 199.105\(d\) \(199.117\(a\)\(3\), 40.355\(g\), 40.355\(h\)\)](#)
 Question Text *Does the process ensure that reasonable cause drug testing is conducted as required?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Reasonable Cause/Reasonable Suspicion Drug and Alcohol Testing". Page 6](#)
15. Question Result, ID, References [Sat, DA.DRUG.RETURNTODUTY.P, 199.105\(e\) \(Part 40 Subpart O, 40.67\(b\), 40.285\(a\), 40.289\(b\), 40.305\(a\)\)](#)
 Question Text *Does the process ensure that return-to-duty drug testing is conducted as required?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Return to Duty Drug and/or Alcohol Testing". Page 8-9](#)
16. Question Result, ID, References [Sat, DA.DRUG.FOLLOWUPTTEST.P, 199.105\(f\) \(40.67\(b\), 40.307, 40.309\)](#)
 Question Text *Does the process ensure that follow-up drug testing is conducted as required?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Follow-up Drug and/or Alcohol Testing". Page 9](#)
17. Question Result, ID, References [Sat, DA.DRUG.MRODUTIES.P, 199.109\(c\) \(199.109\(a\), 40.123\(a\), 40.123\(b\), 40.123\(c\), 40.123\(e\), 40.123\(f\), 40.123\(g\), Part 40 Subpart G\)](#)
 Question Text *Does the process ensure the MRO performs functions as required by DOT Procedures?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "REVIEW OF DRUG TESTING RESULTS: Duties of the Medical Review Officer \(MRO\)". Pages 11-13](#)
18. Question Result, ID, References [Sat, DA.DRUG.MROTESTREPORTS.P, 199.109\(d\) \(Part 40 Subpart G, 40.345\(a\), 40.345\(b\), 40.345\(c\), 40.355\(b\), 40.355\(c\)\)](#)
 Question Text *Does the process ensure the MRO reports all drug test results to the DER as required?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "REVIEW OF DRUG TESTING RESULTS: Duties of the Medical Review Officer \(MRO\)". Page 13, no. 6](#)
19. Question Result, ID, References [Sat, DA.DRUG.STANDOWNREMOVAL.P, 199.103\(a\) \(199.7\(a\), 40.21\(a\), 40.21\(b\), 40.23\(a\), 40.23\(b\), 40.23\(d\), 40.287\)](#)
 Question Text *Does the process ensure an employee is immediately removed from performing covered functions after failing or refusing a drug test?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Disciplinary Action". Page 13](#)
20. Question Result, ID, References [Sat, DA.DRUG.EAP.P, 199.113\(a\) \(199.113\(b\), 199.113\(c\)\)](#)
 Question Text *Does the process ensure that an EAP is established and available to employees and supervisory personnel?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Employee Assistance Program". Page 14](#)

DA.ALCOHOL: Alcohol Misuse Prevention Program

21. Question Result, ID, References [Sat, DA.ALCOHOL.PLAN.P, 199.202](#)
 Question Text *Is a written Alcohol Misuse Plan in-place and maintained that conforms to the requirements of Part 199 and Part 40?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Introduction". Page 1](#)
22. Question Result, ID, References [Sat, DA.ALCOHOL.SERVICEAGENTQUAL.R, 199.5 \(40.213\)](#)
 Question Text *Do records indicate that Alcohol Misuse Prevention Program positions and/or service agents meet the applicable qualification requirements of Part 40 and Part 199?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Alcohol Testing Procedures and Sites". Page 11, para. 4. See attachments for service agents.](#)
23. Question Result, ID, References [Sat, DA.ALCOHOL.PROHIBITEDCONDUCT.P, 199.233 \(199.215, 199.217, 199.219, 199.221, 199.223, 40.23\(c\), 40.285\(a\), 40.285\(b\)\)](#)
 Question Text *Does the process ensure that a covered employee is not permitted to perform covered functions if the employee has engaged in prohibited conduct or an alcohol misuse rule of another DOT agency?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Inquiries into Drug/Alcohol Testing". Page 5](#)
24. Question Result, ID, References [Sat, DA.ALCOHOL.SCREENINGTESTDEVICES.P, 40.229 \(40.235\(e\)\)](#)
 Question Text *Does the process for alcohol screening tests restrict the use of alcohol screening devices (ASDs) to the devices and associated requirements referenced by Part 40?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Alcohol Testing Procedures and Sites". Page 11, para. 3](#)
25. Question Result, ID, References [Sat, DA.ALCOHOL.CONFIRMATIONTESTDEVICES.P, 40.231\(a\) \(40.233\(c\)\)](#)
 Question Text *Does the process for alcohol confirmation tests restrict the use of Evidential Breath Testing Devices (EBTs) to the devices and associated requirements referenced by Part 40?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Alcohol Testing Procedures and Sites". Page 11, para. 3](#)
26. Question Result, ID, References [Sat, DA.ALCOHOL.PREEMPLOY.P, 199.209\(b\) \(199.209\(b\)\(1\), 199.209\(b\)\(2\), 199.209\(b\)\(3\)\)](#)
 Question Text *If pre-employment alcohol testing is conducted, does the process ensure that such testing is performed within the limits of Part 199?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Random Drug Testing". Page 6](#)
27. Question Result, ID, References [Sat, DA.ALCOHOL.POSTACCIDENT.P, 199.225\(a\) \(199.225\(a\)\(1\), 199.225\(a\)\(2\), 199.225\(a\)\(3\), 199.227\(b\)\(4\)\)](#)
 Question Text *Does the process ensure that post-accident alcohol testing is conducted as required?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Post-accident Drug and Alcohol Testing". Page 7](#)
28. Question Result, ID, References [Sat, DA.ALCOHOL.REASONSUSPECT.P, 199.225\(b\) \(199.225\(b\)\(1\), 199.225\(b\)\(2\), 199.225\(b\)\(3\), 199.225\(b\)\(4\), 40.355\(g\), 40.355\(h\)\)](#)
 Question Text *Does the process ensure that reasonable suspicion alcohol testing is conducted as required?*
 Assets Covered [Drug & Alcohol](#)
 Result Notes [Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Reasonable Cause/Reasonable Suspicion Drug and Alcohol Testing". Page 6-7](#)
29. Question Result, ID, References [Sat, DA.ALCOHOL.RETURNDDUTY.P, 199.225\(c\) \(199.233, 199.243\(c\), 40.67\(b\), 40.285\(a\), 40.305\(a\)\)](#)

Question Text *Does the process ensure that return-to-duty alcohol testing is conducted as required?*

Assets Covered Drug & Alcohol

Result Notes Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Return to Duty Drug and/or Alcohol Testing". Page 8-9

30. Question Result, ID, References Sat, DA.ALCOHOL.FOLLOWUPTTEST.P, 199.225(d) (199.243(c)(2)(ii), 40.307(a), 40.307(b), 40.309(a))

Question Text *Does the process ensure that follow-up alcohol testing is conducted as required?*

Assets Covered Drug & Alcohol

Result Notes Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Follow-up Drug and/or Alcohol Testing". Page 8

31. Question Result, ID, References Sat, DA.ALCOHOL.SCREENINGTEST.P, 40.247(a)

Question Text *Does the process ensure that alcohol screening test results are reported as required to the DER?*

Assets Covered Drug & Alcohol

Result Notes Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Appendix D Alcohol Testing Procedures". Page 37, J(1)

32. Question Result, ID, References Sat, DA.ALCOHOL.CONFIRMATIONTEST.P, 40.255(a) (40.355(d))

Question Text *Does the process ensure that alcohol confirmation test results are reported as required to the DER?*

Assets Covered Drug & Alcohol

Result Notes Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "DER Responsibilities". Page 2

33. Question Result, ID, References Sat, DA.ALCOHOL.OTHERCONDUCT.P, 199.237(a) (199.237(b), 40.23(c))

Question Text *Does the process ensure that a covered employee is prohibited from performing or continuing to perform covered functions when found to have an alcohol concentration of 0.02 or greater but less than 0.04?*

Assets Covered Drug & Alcohol

Result Notes Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Alcohol and Drug Prohibitions". Page 4, para. 1

34. Question Result, ID, References Sat, DA.ALCOHOL.EMPLOYEERESOURCES.P, 199.243(a) (40.285(b))

Question Text *Does the process ensure that each covered employee who has engaged in prohibited conduct is advised of the resources available to the covered employee in evaluating and resolving problems associated with the misuse of alcohol?*

Assets Covered Drug & Alcohol

Result Notes Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Alcohol and Drug Prohibitions". Page 4, para. 5

35. Question Result, ID, References Sat, DA.ALCOHOL.EDUCATION.R, 199.239(a) (199.239(a)(1), 199.239(a)(2))

Question Text *Do records indicate educational materials were provided that explain alcohol misuse requirements and the policies and procedures with respect to meeting those requirements?*

Assets Covered Drug & Alcohol

Result Notes Lamb Weston covered employees have access to educational materials through NW Drug Safe. See attached document for an example.

36. Question Result, ID, References Sat, DA.ALCOHOL.EDUCATIONCONTENT.R, 199.239(b)

Question Text *Do records indicate the alcohol misuse educational materials provided by the operator included the required content?*

Assets Covered Drug & Alcohol

Result Notes Lamb Weston covered employees have access to educational materials through NW Drug Safe. See attached document for an example.

37. Question Result, ID, References Sat, DA.ALCOHOL.SUPERVISORTRAINALCOHOL.P, 199.241

Question Text *Does the process include the required 60-minute supervisory personnel training related to recognizing reasonable suspicion for alcohol testing?*

Assets Covered Drug & Alcohol

Result Notes Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Reasonable Cause/Reasonable Suspicion Drug and Alcohol Testing", page 7, para. 4

DA.PROGRAMRECORDS: Drug and Alcohol Program Records

38. Question Result, ID, Sat, DA.PROGRAMRECORDS.RECORDKEEPING.R, 199.117(b) (199.227(a), 199.231(b), 40.333(c),
References 40.333(d), 40.333(e))

Question Text *Are drug and alcohol program records maintained and kept in a secure and proper location?*

Assets Covered Drug & Alcohol

Result Notes Lamb Weston drug and alcohol records are maintained and kept on-site at Lamb Weston and the third party vendor NW Drug Safe.

39. Question Result, ID, Sat, DA.PROGRAMRECORDS.DRUG.R, 199.117(a) (199.117(a)(1), 199.117(a)(2), 199.117(a)(3),
References 199.117(a)(4), 199.117(a)(5), 40.97(b), 40.111(a), 40.333(a)(1), 40.333(a)(2), 40.333(a)(4))

Question Text *Are drug test records retained for five years, three years, and one year as required and readily available?*

Assets Covered Drug & Alcohol

Result Notes Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Recordkeeping Procedures", page 15-16. Drug test records are maintained and kept on-site at Lamb Weston and the third party vendor NW Drug Safe.

40. Question Result, ID, Sat, DA.PROGRAMRECORDS.ALCOHOL.R, 199.227(b) (199.227(b)(1), 199.227(b)(2), 199.227(b)(3),
References 199.227(b)(4), 40.333(a)(1), 40.333(a)(2), 40.333(a)(3), 40.333(a)(4))

Question Text *Are alcohol test records retained for five years, three years, two years, and one year as required and readily available?*

Assets Covered Drug & Alcohol

Result Notes Lamb Weston, Pipeline Workers Drug and Alcohol Misuse Prevention Plan section, "Recordkeeping Procedures", page 15-16. Alcohol test records are maintained and kept on-site at Lamb Weston and the third party vendor NW Drug Safe.

Report Parameters: Results: all

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.