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December 30, 2025

TO: Missouri Natural Gas Operators

FROM: Kathleen McNelis, Pipeline Safety Program Manager

SUBJECT: **1) Random Drug Testing Rate for 2026 – 50%**
2) US DOT Policy and Compliance Notice
3) PHMSA Advisory Bulletin 2025-01 (Promoting SMS)

Note: Copies are not sent to all operator personnel. Please forward to the appropriate person(s).

1) Random Drug Testing Rate for 2026 – 50%

PHMSA has determined that the minimum annual percentage rate for random drug testing for covered employees will be 50 percent during calendar year 2026. A copy of the federal register notification is attached for reference.

2) US DOT Policy and Compliance Notice

The United States Department of Transportation Office of Drug and Alcohol has issued a Policy and Compliance Notice in response to inquiries about the impact of a December 18, 2025, Executive Order directing the Department of Justice to complete the rescheduling process of marijuana from a Schedule I to a Schedule III drug of the Controlled Substances Act (CSA).

The Notice states in part that Marijuana is still a Schedule I drug under the CSA until any rescheduling is complete. It remains unacceptable for any safety-sensitive employee subject to drug testing under the Department of Transportation's drug testing regulations to use marijuana, and that until the rescheduling process is complete, the Department of Transportation's drug testing process and regulations will not change. Transportation employees in safety-sensitive positions will still be subject to testing for marijuana. The full text of the Notice is available at: https://www.transportation.gov/odapc/marijuana-notice.

3) PHMSA Advisory Bulletin 2025-01 (Promoting SMS)

Staff wants to take this opportunity to remind operators that PHMSA issued Advisory Bulletin ADB-2025-01 on March 25, 2025, to encourage regulated pipeline owners and operators to develop and implement a pipeline safety management system (PSMS) based on a framework such as the one detailed in the American Petroleum Institute's (API) Recommended Practice (RP) 1173: Pipeline Safety Management Systems (API RP 1173). A copy of this advisory bulletin is available at:
https://www.govinfo.gov/content/pkg/FR-2025-03-25/pdf/2025-04960.pdf