Associated Builders and Contractors, Inc.

Empire State Chapter

March 19th, 2020

Office of the Chair
New York City Commission on Human Rights
22 Reade Street
New York, New York 10007.

Re: Amendments to Title 47 of the Rules of the City of New York

Dear Commissioner Malalis,

The Empire State Chapter of the Association of Builders and Contractor would like to express it's strong support for the proposed amendment to Title 47 of the Rules of the City of New York. Approving this legislation would allow for pre-employment testing for tetrahydrocannabinols or marijuna for certain positions, specifically those that require regularly working on an active construction site or operating heavy machinery.

As a statewide organization who represents close to 400 members within the construction trade, it is imperative that we support this type of legislation that will surely improve the safety of the worksite and all who work within it. With marijuana use becoming more decriminalized throughout the state, contractors and developers must be able to take the necessary precautions to ensure the safety of their workers and the public. A certain level of danger naturally exists while working on a construction site to begin with, and any level of impairment caused by marijuana use will have serious consequences. We need to be able to do all that is possible to prevent any accidents or injuries that can occur on an active construction site and it begins with ensuring that our workers are of sound mind when they are at work.

Allowing employers to conduct pre-employment testing for marijuana use will help prevent unsafe workers from getting on job sites, removing the risk they would pose to not only themselves, but to their fellow co-workers and the public at large. Thank you for the consideration of our organization's views and we urge you to support this legislation.

Sincerely,

Brian Sampson, President
Associated Builders & Contractors, Empire Chapter

BS/dc
cc: Hon. Bill De Blasio, Mayor
Hon. Corey Johnson, NYC Council Speaker
Hon. Jumaane Williams, Public Advocate
Edwin Tablada, Chief of Staff, NYC Commission on Human Rights

Home
Rulemaking Process 101
Proposed Rules
Recently Adopted Rules
Rules of the City of New York (R.C.N.Y.)
Regulatory Agendas
About NYC Rules
Community Use Policy
Frequently Asked Questions
Useful Links
Contact NYC Rules

Public comments for: Exceptions to Prohibition of Preemployment Testing for Marijuana

Comments

Dr Neha Badheka

Comment:
The exception should include all healthcare workers in all capacity. Healthcare workers (not just doctors, mid level providers, nurses) have tremendous responsibility of patient care and human life in general. Even a hospital cook for example if does not pay attention to food allergies and prepares something while under the influence of marijuana that can be hazardous to patient health. Being able to maintain a sustained level of alertness in healthcare setting is of vital importance and a mandatory requirement. And to be able to fulfill this requirement, not using marijuana is a duty. How long marijuana stays in the system, and at what level we see cognitive impairment (there is no specific level) and how we measure such impairment is all a gray area of science at this time. Hence, keeping healthcare settings free of marijuana is imperative. Thank you.
Agency: CCHR

Testimony on proposed rulemaking by the Commission on Human Rights regarding exemptions to Local Law 91 of 2019, which prohibits pre-employment testing for marijuana and THC
John Corlett, Chairman Legislative Committee, AAA New York State
New York City, APRIL 16, 2020

Thank you for the opportunity to testify today. My name is John Corlett, Legislative Committee Chairman for AAA New York State. I am submitting this testimony on behalf of the AAA Clubs of New York State, a federation of not-for-profit AAA Clubs representing more than 2.8 million members in the State of New York. For the reasons expressed below, we strongly support the promulgation of section (4) of the proposed new section 2-07 of title 47 of the Rules of the City of New York and urge the NYC Commission on Human Rights approve this new section. This exception exemption would permit the pre-employment testing for marijuana and THC for job positions that require employees to operate vehicles on an "approximately" daily basis.

AAA strongly believes maintaining pre-employment drug testing for emergency roadside technicians will ensure the safety of the public, our members and our roadside assistance employees. AAA currently employs 90 roadside technicians in New York City who are responsible for providing safe and reliable emergency service for disabled vehicles twenty-four hours per day and seven days a week, in every weather condition.

Emergency roadside technicians put their lives on the line every day in one of the most dangerous careers in the U.S. An analysis conducted by researchers at the Centers for Disease Control and Prevention showed that the towing industry is 15 times deadlier than all other private industries combined. Specifically, motor vehicle tow operators have an annual fatality rate of nearly 43 deaths per 100,000 workers; while the annual fatality rate for all other U.S. private industries combined, is 2.8 deaths per 100,000 workers. These data include all causes of fatal workplace injuries (e.g., poisoning, homicide, falls, etc.), but motor vehicle incidents are the most frequent cause of death.

Countless studies have shown that marijuana negatively affects psychomotor functions, like attention, reaction time and coordination. These impairing effects contradict the skills tow truck operators need to ensure safety, such as remaining vigilant and reacting quickly to road hazards. Currently, there is no mechanism to discern marijuana impairment. A recent studied published in the Journal of the American Medical Association, found that individuals who test positive for marijuana have 55 percent more industrial accidents. Accordingly, AAA believes for this small group of employees there is no safe amount of marijuana use.

Additionally, given the dangers roadside technicians face daily and the impairing effects of marijuana, and the fact that roadside technicians are alone one-on-one with people in distress as a core part of their job requires that the technician be capable and in full control of their skills, any failure to approve a waiver would in our opinion run counter to the goals of New York City's *Vision Zero* campaign which aims to eliminate fatalities and injuries on the city's roadways.

Accordingly, we respectfully request the Commission on Human Rights to approve this proposed amendment to the Rules of the City of New York.

Respectively submitted, John A Corlett

Public comments for: Exceptions to Prohibition of Preemployment Testing for Marijuana

Comments

Elvis Machuca

Comment:
I don't believe in the exception. Much of the use of Marijuana was based on leisure to be unproductive to employment. The rule shouldn't ignore Section 2-7 $$ a-05 and Section 2-7 $$ b. Use of marijuana cannot justify her or him to have abortion(s) on pretext of Leisure
Agency: CCHR

PARTNERSHIP for New York City

Testimony of the Partnership for New York City

Commission on Human Rights
Proposed Rules on Preemployment Testing for Marijuana

April 16, 2020

Thank you Chair Malalis and members of the Commission on Human Rights (CHR) for the opportunity to testify on proposed rules on preemployment testing for marijuana. The Partnership for New York City represents the city's business leaders and largest private sector employers working to enhance the economy of the five boroughs and maintain the city's position as the pre-eminent global center of commerce, innovation and economic opportunity.

The Partnership provided comments to the Commission for its pre-rulemaking hearing in January. We appreciate that the Commission took those comments seriously and incorporated many of our suggestions into the proposed rules.

Our previous comments suggested that the Commission exempt "workers whose roles involve working on utility poles, near power sources or operating electrical equipment." Instead, the proposed rule exempts employees who "regularly work on power or gas utility lines[.]" We hope the Commission will consider amending this to "regularly work on or near power or gas utility lines[.]" Many workers, particularly in telecommunications, operate in the same space as the utility lines and face the same hazards, even though they may not be working directly on those lines.

Thank you.

Proposed Rules on Preemployment Testing for Marijuana

Mims, Minerva <minerva.mims@lowes.com>

Wed 4/15/2020 1:38 PM

To: Policy (CCHR) <Policy@cchr.nyc.gov>

Good afternoon,

In examining the newly proposed rules I have questions regarding the subsection that reads “The position requires that an employee regularly operate heavy machinery”. Will the commission define what is means by “heavy machinery”? This term is very ambiguous and to avoid misinterpretation of the law it should be clearly be defined or use some industry standard for defining what heavy machinery is.

Thank you,

Minerva Mims
Sr. Analyst, HR Compliance
Lowe’s Companies Inc. | Mooresville, NC 28117
☎office: (704) 758-6941| 💻: minerva.mims@lowes.com
Lowe's Companies Inc. |1000 Lowes Blvd | Mooresville, NC 28117

NASCO
National Association of Security Companies

444 North Capitol Street, NW
Suite 203
Washington, DC 20001
202-347-3257
www.nasco.org

Private security guards should be added to the Commission's exceptions amendment "based on a significant impact to health or safety" to the Rule implementing Local Law 91

The National Association of Security Companies (NASCO) is the nation's largest trade association of contract private security companies. NASCO's members employ over 450,000 security guards throughout the United States, including thousands of security guards in the City of New York.

At this time, New York City is under a virtual lockdown. City residents are under order to stay at home except if they work at or need to go to an essential business. Accordingly, it is vitally important that essential businesses remain operational, essential workers are protected, and all employees, patients, customers and others at these locations are kept safe and abide by social distancing and other health and safety requirements.

In the vast majority of these locations --- hospitals, medical centers, and grocery stores --- it is not the police who is responsible for ensuring people remain safe and abide by the COVID-19 health and safety mandates, it is private security guards. And even before COVID-19, the job of a security guard, was vital to maintaining public safety and order and the protection of residents and properties in NYC.

New York State law defines a security guard as "a person, other than a police officer, employed by a security guard company to principally perform one or more of the following functions within the state:

a. protection of individuals and/or property from harm, theft or other unlawful activity;
b. deterrence, observation, detection and/or reporting of incidents in order to prevent any unlawful or unauthorized activity including but not limited to unlawful or unauthorized intrusion or entry, larceny, vandalism, abuse, arson or trespass on property;
c. street patrol service;
d. response to but not installation or service of a security system alarm installed and/or used to prevent or detect unauthorized intrusion, robbery, burglary, theft, pilferage and other losses and/or to maintain security of a protected premises." (See NY Gen Bus Law Article &-A Sections 89F-H)

Those are some serious job responsibilities. As such, currently, all security guards working for NASCO members in NYC undergo pre-employment drug testing that includes testing for marijuana/THC as a condition for employment. This has been standard industry practice for decades and it is a well-known practice to persons seeking employment as a security guard.

And you don't just have to take the word of security guard employers as to why testing security guards for THC is crucial. In October 2019, the National Safety Council put out a Position/Policy Statement that said "there is no level of cannabis use that is safe or acceptable for employees who work in safety sensitive positions" which are defined as "jobs that impact safety of the employee and the safety of others as a result of performing that job." This fits the definition of a security guard's job.

NASCO strongly believes that given the legally defined job role of a security guard in New York, security guard employers deserves the same extra precaution against having an employee on the job under the influence of THC as Local Law 91 and Commission has provided to employers of persons who drive commercially or daily, or work with children and medical patients, or works on a construction site.

There is no doubt that security guards in New York City work in very public/employee facing positions and the decision of an organization/business/etc. to have security guards -- which can be quite costly -- is based on the determination that there is enough of a safety risk to the organization's employees, customers and or the public that security guards are needed to prevent or counter possible/expected dangers.

- There have been numerous incidents in NYC and across the nation where the alertness, diligence, quick reaction, response and communications with law enforcement by security guards have saved lives and prevented significant harm. There have also been incidents where the actions of security guards have been problematic. Good or bad, the fact is that security guards are often put in very stressful, tense, dangerous situations (e.g. at hospitals, government run facilities) and how a security guard reacts and performs his or her duties definitely has the "potential to significantly impact the health and safety of employees and members of the public."

Does the job of a security guard fit into the Commission's amendment for a position where "Impairment would interfere with the employee's ability to take adequate care in the carrying out of his or her job duties and would pose an immediate risk of death or serious harm to the employee or to other people?" The answer would likely be "Yes" in a situation where a stoned security guard falls asleep on post, or forgets to lock a door, and someone is then able to enter a building and kills or seriously harms someone. Or if an impaired security guard does not follow his post orders and takes actions that lead to someone being killed or harmed. But thankfully, the job of a security guard does constantly involve "an immediate risk of death or serious physical harm." However, it hard to understand why a person working at a daycare center or nursing home or a person delivering food can be screened for THC before employment, but not a security guard.

The bottom line is that Local Law 91 itself and the Commission have both explicitly acknowledged that there are certain jobs that New Yorkers hold where extra precaution should be taken to avoid a person working one of those jobs while under the influence of THC. To not also include security guards in that category of job could have some serious and tragic consequences for New Yorkers.

NASCO respectfully requests that the Commission expand its proposed "Exceptions to the General Prohibition on Preemployment Testing for THC or Marijuana – Based on Significant Impact to Health and Safety" --- to also include security guard jobs which require registration by the State of New York

Sincerely,

Steve Amitay
Executive Director and General Counsel

April 16, 2020

New York Commission on Human Rights
Spector Hall, 22 Reade Street
New York, NY 1007

via email: policy@cchr.nyc.gov

Re: Proposed Rules on Preemployment Testing for Marijuana

Dear Commissioners:

My name is DeVaughn Ward, and I am senior Legislative Counsel at the Marijuana Policy Project ("MPP"), the largest marijuana policy reform organization in the United States. For 20 years MPP has been working to improve marijuana policy throughout the country.

As you know, marijuana was approved for medical usage in New York State in 2014. Earlier this year, New York State was also poised to join 11 other states and the District of Columbia in ending the prohibition of adult use cannabis. As the novel coronavirus swept through New York, legislative priorities quickly shifted making marijuana legislation a difficult issue to resolve before the 2020 budget deadline. In 2019, the concept of legalization fell short after lawmakers failed to reach a consensus on implementation. Fifty-eight percent of New Yorkers now favor of legalizing marijuana for adult use[1]. Undoubtedly the legalization of adult use cannabis is on the horizon for New York State and New York City.

Bill Number 1445 is a necessary tool to protect New York City residents from being discriminated against by their employers for using a substance that is safer than alcohol, and which most New Yorkers believe should be legal. Bill 1445 sensibly prohibits New York City employers from requiring a prospective employee to submit to testing for the presence of any tetrahydrocannabinols (THC), the active ingredient in marijuana, in such prospective employee's system as a condition of employment. The proposed rule provides exceptions for employers to the 1445's prohibitions.

MPP understands that the City Council decided to exclude safety sensitive positions. However, MPP believes the proposed rule goes what is required by 1445. We are particularly concerned by the inclusion of a limitation for anyone who drives daily, which would impact large number of working class New York City residents. Science has proven that cannabis can stay in one's system up to a month after consumption. This means a positive test for marijuana does not prove one is impaired while at work.

MPP urges the Commission to reconsider the proposed rule and narrowly tailor the exceptions to those expressely required by 1445.

Thank you for your time and consideration of this important matter.

Respectfully,

[1] https://scri.siena.edu/2020/01/21/overwhelming-support-for-a-dozen-of-cuomos-state-of-the-state-proposals/

DeVaughn Ward
Senior Legislative Counsel
Marijuana Policy Project
dward@mpp.org

New York City Commission on Human Rights
22 Reade Street
Spector Hall, 1st Floor
New York, NY 10007

April 24, 2020

Re: Local Law 91 of 2019

Dear Chairwoman Carmelyn Malalis and Commission members:

It has come to the attention of the National Drug and Alcohol Screening Association (NDASA) that the Commission is requesting comments concerning the clarification of exceptions to Local Law 91 of 2019, the general prohibition of testing for Marijuana and Tetrahydrocannabinols (THC/Cannabis) for pre-employment testing. Local Law provides for certain jobs to be exempt if they have the "potential to significantly impact the health or safety of employees or members of the public."

NDASA is a national association of drug and alcohol testing professionals that represents laboratories, Medical Review Officers, drug testing facilities, safety personnel, and collectively tens of thousands of employers and hundreds of thousands of employees across the country to include NYC. We are focused on assisting employers and individuals affected by drugs of abuse.

Marijuana is an impairing substance. Illicit drug use substantially threatens workplace safety and productivity. *40% of workplace fatalities are caused by substance use.* Employee drug use costs the U.S. Economy $246 billion annually from decreased productivity, employee turnover, increased medical costs, theft, and increased accidents. Workers who use marijuana, the most widely used drug by U.S. employees, have 75% more absenteeism, 55% more industrial accidents and 85% more workplace injuries than workers who choose to remain drug-free.

Restricting workplace drug testing programs when this nation is in the midst of the Novo Coronavirus (COVID-19) pandemic and the highest unemployment rate since the Great Depression would be detrimental to the rebuilding of the City of New York's employers and employees. There have been many studies that link increased drug abuse during times of hardship and stress. In 2009 an HHS study showed the rate of illicit drug use is twice as high for unemployed persons as those with full-time jobs. (http://www.gmhc.org/files/editor/file/a_pa_nat_drug_use_survey.pdf). A 2017 International Journal of Drug Policy report found evidence that drug use increases in times of recession because unemployment increases psychologial distress which increases drug use. (https://www.sciencedirect.com/science/article/pii/S0955395917300877)

NDASA would recommend, on behalf of our membership and the employers we represent, that this City Commission consider allowing ANY and ALL employers to choose to provide a Safe and Drug Free Workplace. Employers are the entities forced to deal with the effects of marijuana use on their business and their service to the general public. Now is not the time to force employers to be required to consider illicit drug users as employees. Employers should have the unrestricted right to be a drug free workplace including marijuana, THC, and cannabis use, as the health and welfare of the employees and business ultimately rest on the shoulders of the employer.

1629 K St. NW, Suite 300
Washington, DC 20006
(888)31-NDASA

The list of exemptions should be increased to allow all employers to choose to be exempt rather than naming specific types of employers or jobs. In a time of a national health scare and economic crisis, employers should not be forced to reduce their right to employ candidates that are less prone to accidents, theft and absenteeism. Opting-in to public safety should be the right of every employer and not the role of a city government to restrict.

The goal of any drug-free workplace policy is to KEEP employees working and identify those with potential addiction so that treatment options may be offered. We encourage employers to seek creative alternatives to employment termination in favor of keeping people at work.

Without exempting all employers or offering the ability to opt-in or out of Local Law 91 then a burden will be put on the shoulders of employers that would prefer to provide safe work environments by forcing them to accept applicants that are using a known impairing substance.

For the above reasons, we strongly urge you to allow all employers the ability to opt-in or opt-out of an exemption to Local Law 91. Public health, employer rights, and safety in the workplace arena should be a right for **all** employers. Governments should not force employers into creating an unsafe work environment, rather it should give them the right to always have that option.

Sincerely,

National Drug & Alcohol Screening Association
Jim Greer – Chairman
Brian Drew – Vice Chairman
Jo McGuire – Executive Director

1629 K St. NW, Suite 300
Washington, DC 20006
(888)31-NDASA

Eliminating Preventable Deaths

Testimony Regarding Exceptions to Prohibition of Pre-employment Testing for Marijuana
National Safety Council
New York Commission on Human Rights
April 16, 2020

The National Safety Council (NSC) thanks you for recognizing that cannabis impacts the health and safety of New York City employees and citizens, and encourages you to clarify potential exemptions in the amendment to title 47, which prohibits pre-employment testing for cannabis and tetrahydrocannabinols (THC). NSC is a mission-based organization, focused on eliminating the leading causes of preventable death and injury. We focus our efforts and thought leadership on impacting safety through three strategic pillars: Workplace, Roadway and Impairment. Our more than 15,000 member companies represent employees at nearly 50,000 U.S. worksites, including more than 2,100 in New York State.

Research is clear that cannabis affects your mind and body. However, there is no scientifically valid test to detect cannabis impairment. Therefore, NSC believes there is no level of cannabis use that is safe or acceptable for employees who work in safety-sensitive positions.[i] NSC recommends further elucidation to ensure people in safety sensitive jobs, as identified by the employer, are ready to work impairment-free. NSC is concerned by the language stating "The position requires that an employee operate a motor vehicle on an approximately daily basis." Driving while under the influence of any impairing substance like cannabis or alcohol endangers all roadway users. Workplaces should be able to establish policies that may involve prohibiting all use of cannabis for employees in safety-sensitive positions because of the inability to test for impairment, including for those whose responsibilities include driving, no matter the frequency.

Employers are responsible for providing safe workplaces for workers. Without the ability to define impairment from cannabis, employers have primary responsibility to ensure the safety of both employees and the general public. If these workplaces include safety sensitive occupations such as driving, operating heavy machinery, child care, health care and individuals carrying firearms, their policies should reflect an ability to maintain a substance-free workplace through pre-employment drug testing for cannabis and other substances, and to take other appropriate measures. These policies should be established in a transparent manner with workers at the table.

We encourage you to prioritize safety as you work to amend title 47 to allow workplaces with safety sensitive occupations to continue pre-employment drug testing. This includes ensuring the safety and the wellbeing of the over 4.6 million workers in New York City, and the millions of residents and visitors who interact with them, by ensuring safety sensitive positions are exempted.[ii]

As a reminder, there are already certain occupations which are federally regulated and therefore are exempted from this law, such as commercial truck drivers, pilots and others. It is incumbent upon New York City to clearly communicate to these businesses and their employees they must continue to comply with federal regulations.

Thank you for your attention to this issue. If you have any questions, please contact Tara Leystra Ackerman at tara.leystra@nsc.org or 202-602-1020.

[i] "Safety Sensitive" refers to jobs that impact safety of the employee and the safety of others as a result of performing that job. For example, 49 CFR §382.107 defines safety sensitive for commercial motor vehicle operators.
[ii] https://www.bls.gov/regions/new-york-new-jersey/data/xg-tables/ro2xgcesnyc.htm

Raymond C Calore
9 Crescent Dr.
Cortlandt Manor, New York 10567

April 7, 2020

Office of the Chair
New York City Commission on Human Rights
22 Reade Street
New York, New York 10007

To Whom It May Concern,

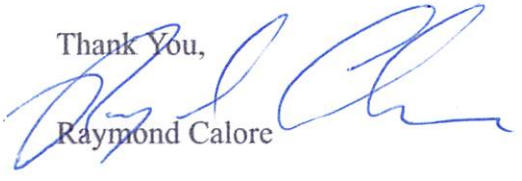
I believe that Pre-Employment testing for Tetrahydrocannabinols (THC) or Marijuana is not only a waste of money, this Pre-Employment testing is a direct violation of our basic human rights against an over-reaching government. **Pre-Employment testing for cannabis use is not a test for impairment.**

It is well documented that THC or Marijuana can stay in a person's system for up to a month or longer. Marijuana patients and consumers who are required to undergo Pre-Employment testing for THC or Marijuana could have stopped using cannabis products weeks prior to taking a Pre-Employment test and still test positive for THC or marijuana. It must be discussed that a failed Pre-Employment test is not an indicator that that person is a bad person, high or even a danger to themself, their employer or society. A failed Pre-Employment test only suggests that the individual failing that test may have traveled to a marijuana legal state and consumed marijuana products legally in the past 30 days, has not violated any state law with regards to possession limits, or is a registered medical marijuana patient in New York State and is afforded all rights and protections of any other New York State resident.

Any individual who passes the Pre-Employment test for Tetrahydrocannabinols (THC) or Marijuana only verifies that person did not use cannabis in the 30 days prior to taking the test and nothing more. This Pre-Employment THC testing will only keep good responsible medical marijuana patients and cannabis consumers looking for employment from taking their medicine for 30 days. For someone who is using THC and CBD products with the permission of the New York State Government for PTSD, seizures and cancer 30 days is a long time.

Pre-Employment for THC or Marijuana is a waste of money and a violation to our basic rights as humans and paitents to consume a product with recognizable medical benefits in New York State.

Thank You,



Raymond Calore

April 15, 2020

Ms. Carmelyn P. Malalis
Chair and Commissioner
New York City Commission on Human Rights
22 Reade Street
New York, NY 10007

Dear Commissioner Malalis,

On behalf of Quest Diagnostics, thank you for the opportunity to provide the following comments on the proposed rule clarifying exceptions to the general prohibition on preemployment testing for tetrahydrocannabinols or marijuana. Quest Diagnostics empowers people to take action to improve health outcomes. Derived from the world's largest database of clinical lab results, our diagnostic insights reveal new avenues to identify and treat disease, inspire healthy behaviors and improve health care management. Quest annually serves one in three adult Americans and half the physicians and hospitals in the United States, and our 45,000 employees understand that, in the right hands and with the right context, our diagnostic insights can inspire actions that transform lives.

As your healthcare industry partner, we write in support of the proposed rule to exempt positions that are deemed to significantly impact the health or safety of employees or members of the public from the general prohibition on preemployment testing for tetrahydrocannabinols or marijuana. Quest Diagnostics is a strong advocate for an employer's right to drug test applicants and employees as a component of maintaining a safe workplace. Quest Diagnostics does not take a position on cannabis legalization or medical cannabis programs in general. ***However, Quest believes that any law or ordinance legalizing the recreational use of cannabis should protect an employer's right to maintain drug-free workforce policies for safety-sensitive employees.***

As you know, the effects of cannabis use, including impaired judgement and ability to perform divided attention tasks (e.g. driving), shortened attention span and changes in motor skills, can adversely affect the safety and health of others in the workplace or the larger community. The National Safety Council (NSC) has called on employers to restrict cannabis use for those in safety-sensitive positions, which it defines as positions "that impact the safety of the employee and the safety of others as a result of performing that job." In fact, the federal government *requires* safety-sensitive transportation employees (e.g. pilots, transit and rail operators or commercial drivers) to maintain drug testing programs for applicants and employees. This, of course, ensures the safety of the general public.

We applaud the commission's focus on this critically important topic. If you have any questions, Please feel free to reach out to me or David Reiner, Senior Director, State Government Affairs at 201-602-3993 or David.M.Reiner@questdiagnostics.com.

Sincerely,

R.H. Barry Sample, PhD
Senior Director of Science and Technology, Quest Diagnostics Employer Solutions