

HOW TO MONITOR COLLECTION SITE COMPLIANCE

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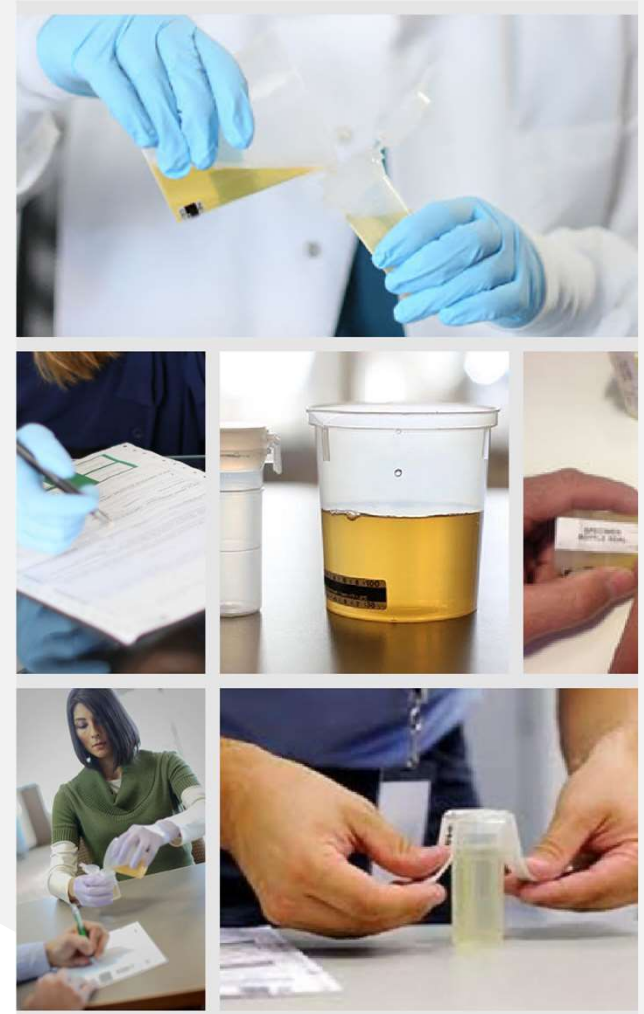
Center for Urban Transportation Research

FTA Drug and Alcohol Program National Conference

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U.S. Department of Transportation
Federal Transit Administration



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Session Agenda

1. Discuss the importance of monitoring collection site compliance.
2. Outline the DOT-required collection site security and integrity measures.
3. Define the common procedural errors in DOT urine specimen collection and DOT alcohol testing.
4. Identify methods of monitoring collection site compliance.
5. Provide tools and checklists to aid DAPMs in their compliance monitoring efforts.

Importance of Monitoring Compliance

- Urine specimen collection and alcohol tests require critical procedural steps that are subject to human error.
 - Procedural errors can lead to incomplete employer records, cancelled tests, infringement on the rights of the donor and potential legal challenges for employers.
- FTA-covered employers are required to comply with testing regulations and must ensure that all testing is performed in accordance with USDOT's 49 CFR Part 40.
 - Your agency's compliance is contingent on your service agent's compliance with the regulations.
 - When audited, the findings and corrective action requirements are attributed to the employer, not the service agent.



Security and Integrity



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DOT's 10 Steps to Collection Site Security and Integrity
Office of Drug and Alcohol Policy and Compliance
U.S. Department of Transportation

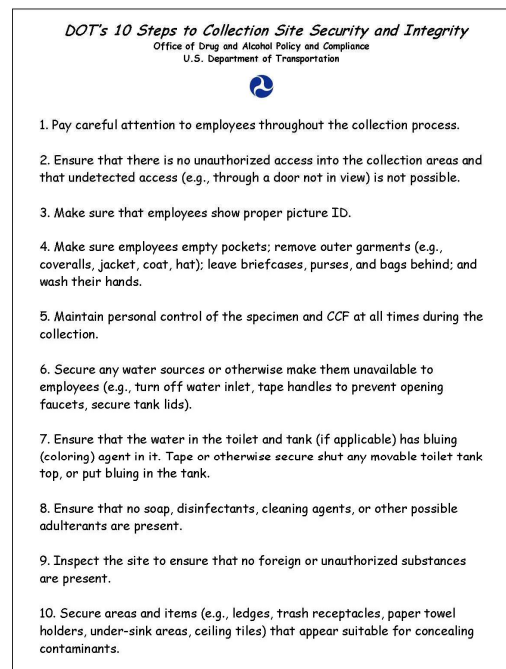


1. Pay careful attention to employees throughout the collection process.
2. Ensure that there is no unauthorized access into the collection areas and that undetected access (e.g., through a door not in view) is not possible.
3. Make sure that employees show proper picture ID.
4. Make sure employees empty pockets; remove outer garments (e.g., coveralls, jacket, coat, hat); leave briefcases, purses, and bags behind; and wash their hands.
5. Maintain personal control of the specimen and CCF at all times during the collection.
6. Secure any water sources or otherwise make them unavailable to employees (e.g., turn off water inlet, tape handles to prevent opening faucets, secure tank lids).
7. Ensure that the water in the toilet and tank (if applicable) has bluing (coloring) agent in it. Tape or otherwise secure shut any movable toilet tank top, or put bluing in the tank.
8. Ensure that no soap, disinfectants, cleaning agents, or other possible adulterants are present.
9. Inspect the site to ensure that no foreign or unauthorized substances are present.
10. Secure areas and items (e.g., ledges, trash receptacles, paper towel holders, under-sink areas, ceiling tiles) that appear suitable for concealing contaminants.

Collection Site Security and Integrity

- Maintaining “security and integrity” = removing opportunities for donors to thwart the DOT drug testing process.
 - Closely monitoring the donor’s behavior, and verifying proper ID
 - Requiring the donor to empty pockets and remove outer clothing
 - Maintaining control of the specimen and the CCF
 - Securing water sources and using bluing agent in toilet
 - Removing all potential contaminants
 - Securing any areas that could conceal contaminants

[The ODAPC poster can be downloaded here.](#)



Security and Integrity Discussion




Urine Collection



Federal Drug Testing Custody and Control Form (CCF)

- 5 copies:
 - Copy 1: Test Facility (laboratory)
 - Copy 2: Medical Review Officer
 - Copy 3: Collector
 - Copy 4: Employer
 - Copy 5: Donor

FEDERAL DRUG TESTING CUSTODY AND CONTROL FORM



SPECIMEN ID NO. **0000001** ACCESSION NO. _____

STEP 1: COMPLETED BY COLLECTOR OR EMPLOYER REPRESENTATIVE

A. Employer Name, Address, I.D. No. _____ B. MRO Name, Address, Phone No. and Fax No. _____

C. Donor SSN, Employee I.D., or CDL State and No. _____

D. Specify Testing Authority: HHS NRC Specify DOT Agency: FMCSA FAA FRA FTA PHMSA USCG

E. Reason for Test: Pre-employment Random Reasonable Suspicion/Cause Post Accident Return to Duty Follow-up Other (specify) _____

F. Drug Tests to be Performed: THC, COC, PCR, OPI, AMP THC & COC Only Other (specify) _____

G. Collection Site Address: _____ Collector Contact Info: Phone _____
 Fax _____
 Other _____

STEP 2: COMPLETED BY COLLECTOR (make remarks when appropriate). URINE ORAL FLUID

COLLECTION: Split Single None Provided, Enter Remark: _____

URINE: Collector reads urine temperature within 4 minutes. Temperature between 90° and 100° F? Yes No, Enter Remark Observed, Enter Remark _____

ORAL FLUID: Split Type: Serial Concurrent Subdivided Each Device Within Expiration Date? Yes No Volume Indicator(s) Observed _____

REMARKS: _____

STEP 3: Collector affixes seal(s) to bottle(s)/tube(s). Collector dates seal(s). Donor initials seal(s). Donor completes STEP 5 on Copy 2 (MRO Copy)

STEP 4: CHAIN OF CUSTODY - INITIATED BY COLLECTOR AND COMPLETED BY TEST FACILITY

I certify that the specimen given to me by the donor identified in the certification section on Copy 2 of this form was collected, labeled, sealed and released to the Delivery Service noted in accordance with applicable federal requirements.

Signature of Collector _____ AM _____ PM (PRINT) Collector's Name (First, MI, Last) _____ Date (Mo/Day/Yr) _____ Time of Collection _____	SPECIMEN BOTTLE(S)/TUBE(S) RELEASED TO: _____ Name of Delivery Service _____
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RECEIVED AT LAB OR IITF:

Signature of Accessioner _____ (PRINT) Accessioner's Name (First, MI, Last) _____ Date (Mo/Day/Yr) _____	Primary Specimen Seal Intact <input type="checkbox"/> YES <input type="checkbox"/> NO If NO, Enter remark in Step 5A. _____	SPECIMEN BOTTLE(S)/TUBE(S) RELEASED TO: _____
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Primary/Single Specimen Device Expiration Date: ____/____/____ Split Specimen Device Expiration Date: ____/____/____

STEP 5A: PRIMARY SPECIMEN REPORT - COMPLETED BY TEST FACILITY

NEGATIVE DILUTE REJECTED FOR TESTING ADULTERATED SUBSTITUTED INVALID RESULT

POSITIVE for: _____
 Analyte(s) in ng/mL _____



REMARKS: _____
 Test Facility (if different from above): _____
 I certify that the specimen identified on this form was examined upon receipt, handled using chain of custody procedures, analyzed, and reported in accordance with applicable federal requirements.

Signature of Certifying Technician/Scientist _____ (PRINT) Certifying Technician/Scientist's Name (First, MI, Last) _____ Date (Mo/Day/Yr) _____

STEP 5b: COMPLETED BY SPLIT TESTING LABORATORY

RECONFIRMED FAILED TO RECONFIRM - REASON _____
 I certify that the split specimen identified on this form was examined upon receipt, handled using chain of custody procedures, analyzed, and reported in accordance with applicable federal requirements.

Laboratory Name _____
 Laboratory Address _____ Signature of Certifying Scientist _____ (PRINT) Certifying Scientist's Name (First, MI, Last) _____ Date (Mo/Day/Yr) _____

 0000001 SPECIMEN A _____ Date (Mo/Day/Yr) _____ Donor's Initials _____	PLACE OVER CAP _____
 0000001 SPECIMEN B _____ Date (Mo/Day/Yr) _____ Donor's Initials _____	PLACE OVER CAP _____

COPY 1 - TEST FACILITY COPY

Version C 6/16/2020

OMB No. 0750-0188

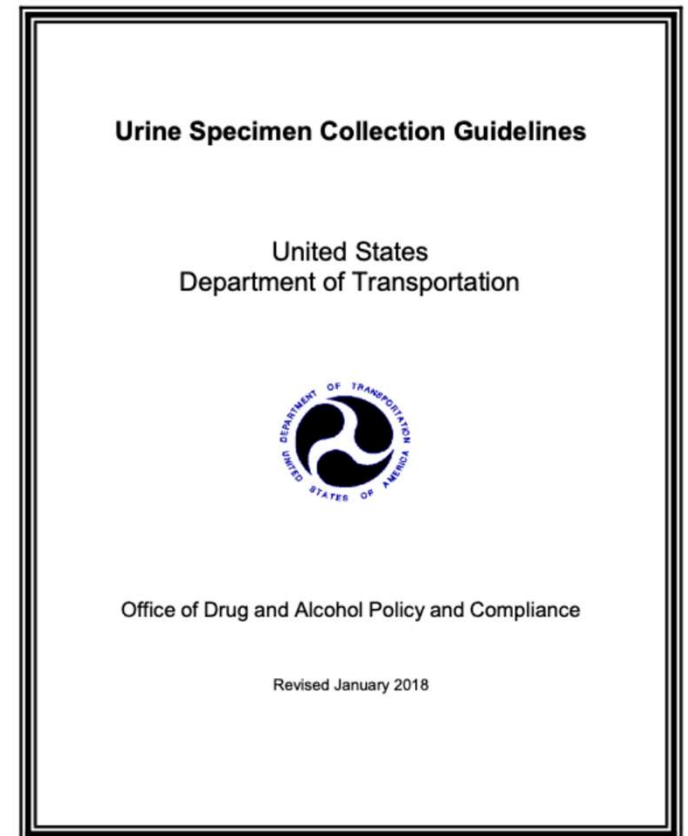
PRESS HARD - YOU ARE MAKING MULTIPLE COPIES

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Urine Collection Procedures and Guidelines

You may find it helpful to read the specific steps that the collector must take to properly perform a DOT urine specimen collection. The details can be found here:

- 49 CFR Part 40- Subpart E:
 - <https://www.ecfr.gov/current/title-49/subtitle-A/part-40/subpart-E>
- Urine Specimen Collection Guidelines:
 - <https://www.transportation.gov/odapc/urine-specimen-collection-guidelines>



Common Errors in Urine Collection

- The collector did not require the donor to make an initial attempt.
- The collector did not properly verify donor identity.
- The donor was not shown collection instructions (Note: The instructions have been removed from the back of the CCF and now should be posted or handed to the donor.)
- The collector did not allow donor to retain their wallet after inspection.
- The collector did not ask donor to demonstrate that pockets were empty (dog ears) and/or did not ask for all pockets to be emptied.
- The collector did not observe the donor washing their hands.



Common Errors in Urine Collection, cont.

- The collector did not check restroom for signs of tampering after donor provided the specimen.
- The collector did not keep the specimen in view or left the donor alone with specimen.
- The collector did not complete the CCF in the correct order.
 - The correct order is 1,2,3,5,4.
- The collector asked donor to initial specimen labels while still affixed to the CCF.
- The collector did not transmit Copy 4 to the DER within 24 hours or the next business day, as required.



Shy Bladder Procedures, 40.193

- Shy bladder clock starts when donor presents less than 45mL of urine.
 - The collector discards insufficient specimen and marks the time in the remarks line on CCF.
 - The donor has a maximum of three hours to produce a sufficient specimen.
 - The donor must be offered no more than 40oz of fluid at reasonable intervals.
 - The collector must measure fluid and document intake in remarks line on CCF.
 - The donor must be supervised with no access to public or outside during waiting period.



Signs of Tampering, 40.67(c)

- Direct observation collections must take place immediately following one of these circumstances:
 - The donor's specimen is not within the temperature range of 90-100 degrees Fahrenheit.
 - The donor's specimen appears to have been tampered with (odd color, odd odor, etc.).
 - The collector has observed materials or conduct indicating an attempt to tamper (inspection of the restroom after the donor provides specimen is vital).
- The collector must not offer fluids or a waiting period to the donor– an initial attempt under direct observation must take place immediately.



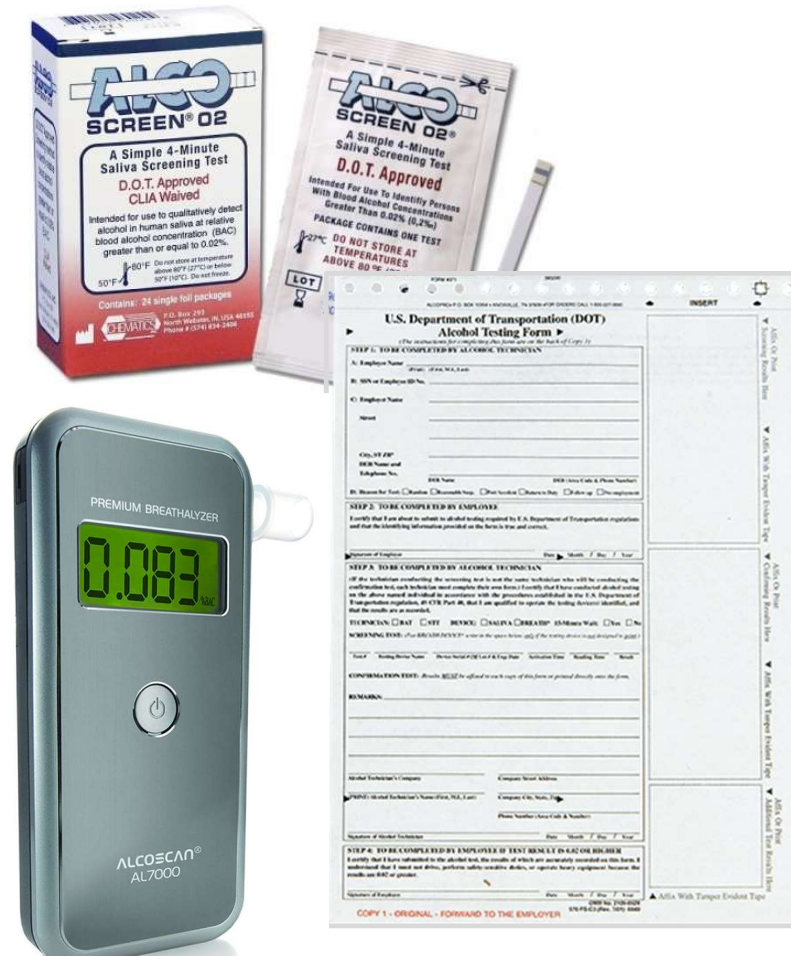
Alcohol Testing



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Alcohol Testing Devices

- Saliva and breath specimens are approved for screening tests; an Evidential Breath Testing (EBT) device must be used for confirmation testing.
- Devices used in alcohol testing must be approved by the National Highway Traffic Safety Administration (NHTSA) and are posted on the ODAPC website.
- DOT Alcohol Testing Form (ATF) must be used for all FTA required tests.



Alcohol Testing Privacy and Security

- Must provide aural and visual privacy to the greatest extent possible.
- Must prevent unauthorized access to the testing area and devices.
- Must always supervise employee/donor.
- Must not permit anyone other than the technician, the donor and a DOT agency representative to observe an alcohol test.
- Devices must be secured when not in use.



Training requirements: 49 CFR Part 40.213
Procedures: 49 CFR Part 40.241 & 40.251

Compliance Monitoring

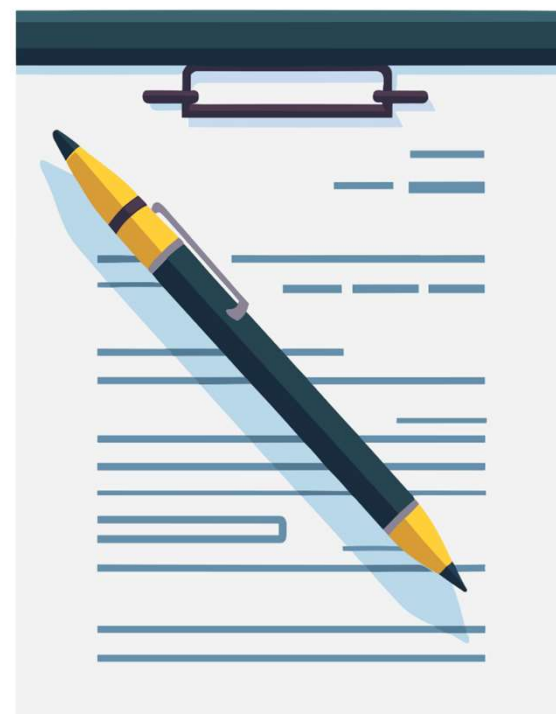


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Where to Begin (Best Practices)

- Start with the RFP process.
 - Set clear expectations.
 - Cite specific regulations.
 - Consider a liquidated damages clause.
- Obtain collector and BAT qualifications.
 - Remember: DOT does not “certify” collectors, collectors must be *DOT-qualified*.
- Review employer copies of the CCF and ATF for errors.
- Track cancelled tests.
- Conduct collection site inspections.



3 Methods of Monitoring

Best Practices for Ensuring Compliant Collections



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1. Rapport and Review

- Build a rapport with your collectors.
 - Set a meeting with the collection site manager and provide a copy of your policy, 49 CFR Part 40, and the Urine Specimen Collection Guidelines.
 - Ask to see a mock collection performed.
 - Ask for documentation that all collectors are qualified (per 40.33).
 - Ask if all collectors are subscribed to the ODAPC list-serve, as required. Note: each individual collector must subscribe, not just the collection site manager.
- Review your expectations.
 - Will they prioritize your reasonable suspicion and post-accident tests?
 - Will they conduct after hours collections for you?
 - How and when will they transmit the employer copies of CCFs and ATFs?



2. Inspect and Inform

- Conduct unannounced inspections of the collection site's security and integrity measures.
 - Pose as a donor, or simply ask to inspect the site.
- Conduct an interview with the collector in which you ask them to describe how they would handle various anomalies.
 - Shy bladder, cold specimen, EBT printer failure, etc.
- After conducting the inspection and the interview, inform the collection site manager of your concerns in writing.



3. Document and Demand

- Document all findings.
 - Unresolved areas of concern from prior inspections/interviews
 - Errors or omissions discovered on the employer copies of the CCFs and ATFs
 - Cancelled tests caused by collector error (fatal flaws)
 - Use of non-DOT forms for FTA tests
 - Testing that was ordered but not performed
- Prepare a written report and demand corrective action to continue the business relationship.



TPA Assigned Collection Sites

- Do not assume that collection sites are fully-compliant because they have been “approved” by your TPA.
 - Most TPAs do not conduct collection site inspections .
 - Your agency must obtain and maintain documentation that each collector is qualified in accordance with 40.33 and all BATs are qualified in accordance with 40.213.
 - Include the TPA in any communication you have with the collection site related to errors.
 - When errors are significant, or they continue to occur, the collection site should be removed from the “approved” list.
 - TPA may have more leverage in getting errors corrected because they likely have multiple clients using the site.

Tools & Resources

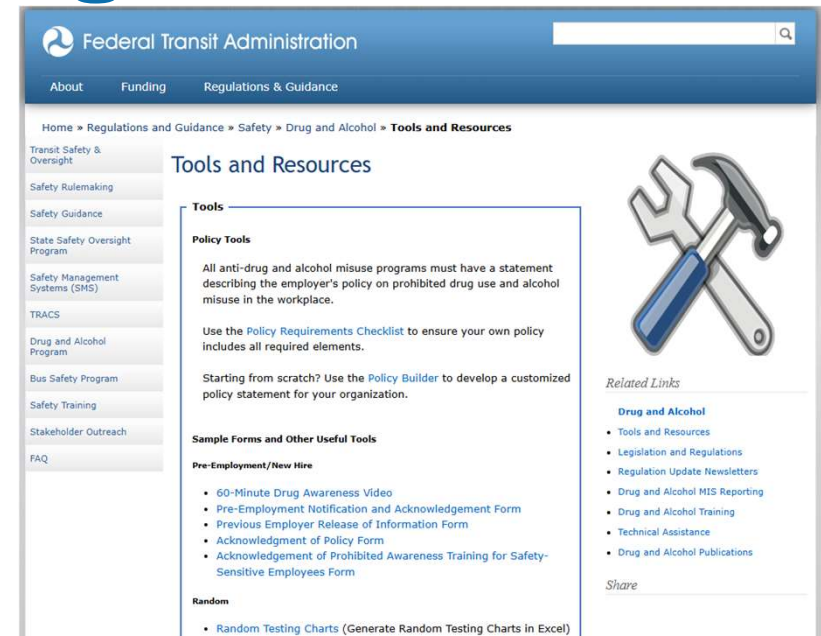


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FTA's Tool & Resources Web Page

- Notification for Testing Form
- Breath Collection Checklist
- Alcohol Testing Form and Review Checklist
- Alcohol Testing Site Affidavit (MFR)
- Example of Completed CCF and Review Checklist
- Drug Test Collection Site Affidavit Form (MFR)



The screenshot shows the Federal Transit Administration's website. The header includes the FTA logo and navigation links: About, Funding, and Regulations & Guidance. The main content area is titled "Tools and Resources" and features a sidebar with a navigation menu. The main content includes sections for "Policy Tools", "Sample Forms and Other Useful Tools", and "Random". A graphic of a wrench and hammer is positioned to the right of the main content. Below the main content is a "Related Links" section with a list of links and a "Share" button.

Federal Transit Administration

Home » Regulations and Guidance » Safety » Drug and Alcohol » **Tools and Resources**

Tools and Resources

Tools

Policy Tools

All anti-drug and alcohol misuse programs must have a statement describing the employer's policy on prohibited drug use and alcohol misuse in the workplace.

Use the [Policy Requirements Checklist](#) to ensure your own policy includes all required elements.

Starting from scratch? Use the [Policy Builder](#) to develop a customized policy statement for your organization.

Sample Forms and Other Useful Tools

Pre-Employment/New Hire

- 60-Minute Drug Awareness Video
- Pre-Employment Notification and Acknowledgement Form
- Previous Employer Release of Information Form
- Acknowledgment of Policy Form
- Acknowledgement of Prohibited Awareness Training for Safety-Sensitive Employees Form

Random

- [Random Testing Charts](#) (Generate Random Testing Charts in Excel)

Related Links

Drug and Alcohol

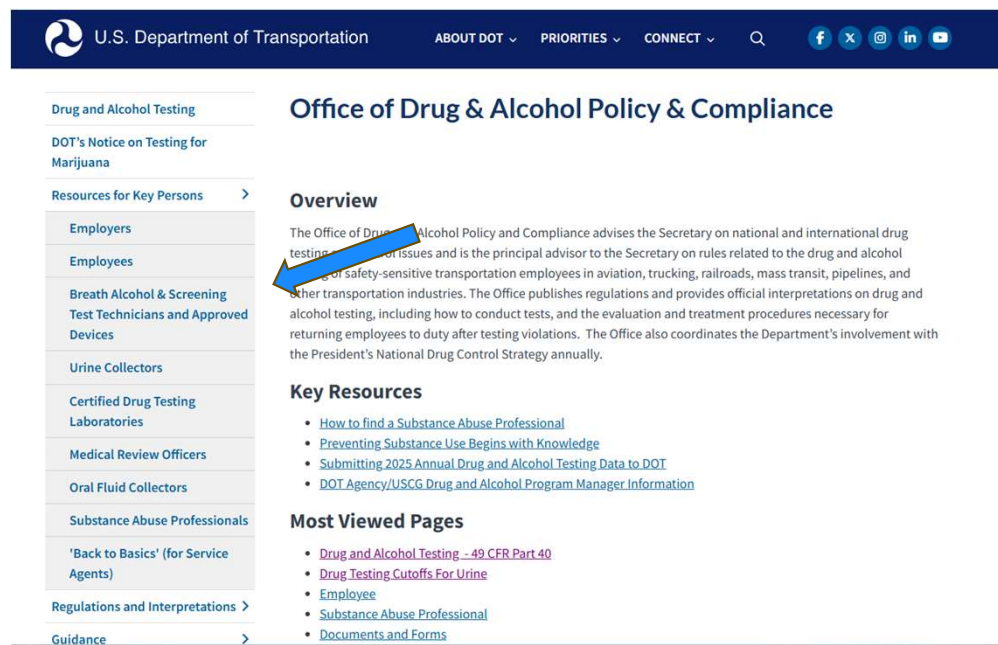
- Tools and Resources
- Legislation and Regulations
- Regulation Update Newsletters
- Drug and Alcohol MIS Reporting
- Drug and Alcohol Training
- Technical Assistance
- Drug and Alcohol Publications

[Share](#)

[FTA's Tools & Resources Web Page](#)

ODAPC's Employer Web Page

- Employer Brochure: Monitoring Collection Sites
- DOT's Direct Observation Procedures
- DOT's 10 Steps to Collection Site Security and Integrity video
- DOT's Mock Collection video



The screenshot shows the website for the Office of Drug & Alcohol Policy & Compliance. The header includes the U.S. Department of Transportation logo and navigation links for 'ABOUT DOT', 'PRIORITIES', and 'CONNECT'. A search bar and social media icons are also present. The main content area is titled 'Office of Drug & Alcohol Policy & Compliance' and features an 'Overview' section with a blue arrow pointing to the text. Below the overview is a 'Key Resources' section with a list of links, and a 'Most Viewed Pages' section with another list of links. A left-hand navigation menu lists various topics such as 'Drug and Alcohol Testing', 'DOT's Notice on Testing for Marijuana', and 'Resources for Key Persons'.

U.S. Department of Transportation

ABOUT DOT ▾ PRIORITIES ▾ CONNECT ▾

Office of Drug & Alcohol Policy & Compliance

Overview

The Office of Drug & Alcohol Policy and Compliance advises the Secretary on national and international drug testing issues and is the principal advisor to the Secretary on rules related to the drug and alcohol testing of safety-sensitive transportation employees in aviation, trucking, railroads, mass transit, pipelines, and other transportation industries. The Office publishes regulations and provides official interpretations on drug and alcohol testing, including how to conduct tests, and the evaluation and treatment procedures necessary for returning employees to duty after testing violations. The Office also coordinates the Department's involvement with the President's National Drug Control Strategy annually.

Key Resources

- [How to find a Substance Abuse Professional](#)
- [Preventing Substance Use Begins with Knowledge](#)
- [Submitting 2025 Annual Drug and Alcohol Testing Data to DOT](#)
- [DOT Agency/USCG Drug and Alcohol Program Manager Information](#)

Most Viewed Pages

- [Drug and Alcohol Testing - 49 CFR Part 40](#)
- [Drug Testing Cutoffs For Urine](#)
- [Employee](#)
- [Substance Abuse Professional](#)
- [Documents and Forms](#)

Drug and Alcohol Testing

DOT's Notice on Testing for Marijuana

Resources for Key Persons >

Employers

Employees

Breath Alcohol & Screening Test Technicians and Approved Devices

Urine Collectors

Certified Drug Testing Laboratories

Medical Review Officers

Oral Fluid Collectors

Substance Abuse Professionals

'Back to Basics' (for Service Agents)

Regulations and Interpretations >

Guidance >

<https://www.transportation.gov/odapc/employer>

Time For Questions



Thank you!

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