



U.S. Department
of Transportation
**Federal Transit
Administration**
Office of Safety and Security

FTA Drug And Alcohol Regulation *Updates*

Spring 1999

Issue 11

Introduction....

The Federal Transit Administration (FTA) published its final rules on prohibited drug use (49 CFR Part 653) and the prevention of alcohol misuse (49 CFR Part 654) on February 15, 1994. Shortly thereafter, the FTA published the *Implementation Guidelines for Drug and Alcohol Regulations in Mass Transit* to provide a comprehensive overview of the regulations.

Since the *Guidelines* were published there have been numerous amendments, interpretations, and clarifications to the Drug and Alcohol testing procedures and program requirements.

This publication is being provided to update the *Guidelines* and inform your transit system of all of these changes. This Update is the eleventh in a series.

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Snider Joins FTA Safety & Security Office

Judy Meade, Director of the FTA Office of Safety and Security, proudly announces the addition of Mark Snider as the new FTA Drug and Alcohol Program Manager. In this capacity, Mr. Snider will be responsible for all aspects of the program including the audit program and technical assistance efforts.

Mr. Snider comes to FTA from the Federal Highway Administration (FHWA) where he served as the FHWA Drug and Alcohol Program Manager from 1992 to 1998. He also served as a FHWA Safety Investigator from 1987 to 1992. During his tenure with FHWA, Mr. Snider presented several papers and seminars on the topics of drugs and alcohol.

Mr. Snider reaffirmed FTA's commitment to the Drug and Alcohol Program and noted that the compliance audit program, along with the current technical assistance efforts would continue. All issues and concerns related to the program should be directed to Mr. Snider at (202) 366-1080 or mark.snider@fta.dot.gov.

Regulatory Compliance and TEA-21

Under the Transportation Equity Act for the 21st Century (TEA-21), grantees serving urbanized areas of 200,000 or more, will no longer receive operating assistance from the FTA. The FTA drug and alcohol testing rules will continue to apply to these recipients of FTA funds. The rules apply to recipients under 49 U.S.C. 5307, 5309, and 5311, and 23 U.S.C. 103 (e)

(4) and will remain applicable throughout the useful life of equipment purchased with FTA capital assistance.

Similarly, safety-sensitive contractors will continue to be subject to the program requirements regardless of whether they are paid with Federal or local funds, or whether contracts for these services are Federally or locally funded.

Safety-Sensitive Maintenance Contractors

As reported in Issue 10 of the *Updates*, FTA published a final rule on January 5, 1999 (Volume 64, pp. 425-427) that clarified its definition of safety-sensitive maintenance functions. The rule modification will potentially impact the number and type of maintenance contractors that will fall under the auspices of these regulations for urbanized systems (Section 5311 maintenance contractors remain exempt).

The rule requires all maintenance contractors that stand in the shoes of an urbanized system in the performance of engine repair, revenue service vehicle repair, equipment repair, component rebuild and overhaul to have a compliant program that meets the same standards as the transit system. A written contract between a grantee and its contractor is not required for the rule to apply.

The applicability of the rule is determined by the course of conduct between the parties. If the grantee always goes to the same contractor for overhaul/rebuilding work, and the contractor, based on its past relationship with the grantee, reasonably expects to perform the grantee's overhaul/rebuild work, the rule applies. The rule does not apply when overhaul/rebuild work is done on a one-time, incidental or emergency basis, where there is no long-term contract or on-going relationship between the grantee and its contractors.



Recent Court Actions

Where To Find?.....

49CFR Part 653, Prevention of
Prohibited Drug Use in Transit
Operations
February 15, 1994
Federal Register Vol. 59
Pages 7572-7611

Amended:

August 2, 1995
Federal Register Vol. 60
Pages 39618-39620
Primary Topic: Exemption of Volunteers and
Post-Accident Testing Provision

December 8, 1998
Federal Register Vol. 63
Pages 61612-61613
Primary Topic: Use of Law Enforcement
Post-Accident Test Results

December 14, 1998
Federal Register Vol. 63
Pages 68818-68819
Primary Topic: Random Drug Testing Rate at
50%

January 5, 1999
Federal Register Vol. 64
Pages 425-427
Primary Topic: Safety-sensitive Maintenance
Functions

Technical Corrections:

March 6, 1995
Federal Register Vol. 60
Pages 12296-12300
Primary Topic: Corrections and Clarifications

The information presented on this
page should be used to update
Chapter 2 of the *Implementation
Guidelines*.

Two Recent Court Decisions Concern DOT/ FTA Drug and Alcohol Testing Regulations

FTA has learned of two recent decisions, one issued by a Federal appeals court in San Francisco, and the other by a federal district court in Philadelphia, implicating FTA testing regulations. Each case involves FTA's drug- and alcohol-testing regulations (49 CFR Parts 653 and 654) as applied to certain employees. Both courts decided that the employees should have an opportunity to prove their cases.

The California case, *Gonzalez v. Metropolitan*

Transportation Authority, was filed in April 1996 on behalf of a radio dispatcher and instructor employed by LACMTA. The district court dismissed the complaint, which challenged the grantee's policy, and the plaintiffs appealed. On April 14, 1999, a unanimous panel of the 9th Circuit reversed and sent the case back to the trial court to review the designation of dispatchers as safety-sensitive workers.

The appeals court stated: "We do not know, from the record we have, whether the employees at issue would pose a substantial immediate threat to public safety if impaired by drugs or alcohol, or whether the procedure for testing them would be reasonably effective for finding out if they are impaired, or whether the tests as performed were an undue invasion of their privacy. Facts might be proved under the complaint that would entitle plaintiffs to relief." The employees challenging the testing have the burden of proving the case.

Until this matter is ultimately resolved, FTA grantees, subrecipients (and their covered contractors) must continue to implement FTA's drug and testing regulations, including those affecting dispatchers.

The second case, *Wilson v. SEPTA and TWU Philadelphia Local 234*, was filed in Federal district court in Philadelphia by a bus operator who was fired after twice testing positive for alcohol. He alleges that his firing is discrimination under the Americans with Disabilities Act (ADA). SEPTA moved to dismiss the complaint, arguing that the plaintiff was not a qualified individual with a disability at the time SEPTA discharged him. In a ruling dated January 26, 1999, the court declined to dismiss the complaint. The court found that the employee met the definition of "disabled" for establishing a *prima facie* case of discrimination under the ADA in connection with his discharge from SEPTA. The ultimate issue of whether the firing was disability discrimination is yet to be determined by the court.

Because FTA has consistently held that the determination to retain or discharge an employee for having tested positive is a local decision, this opinion is not viewed as establishing a conflict between the ADA and FTA's drug and alcohol testing rule.



Audit Questions Available On Web

In response to several requests from the transit industry, FTA has posted the questions used in the FTA drug and alcohol testing program audits on the internet. This information is released with the intent of assisting transit systems with their efforts to develop and maintain compliant programs. The address where the audit questions can be found is: <http://transit-safety.volpe.dot.gov/audit.htm> or the questions can be obtained from the FTA homepage.

From the FTA homepage (www.fta.gov):

- ⇒ click on "Safety and Security" then;
- ⇒ click on "Transit Safety" then;
- ⇒ click on "Drug and Alcohol Testing Program"; then
- ⇒ click on "Program Review Checklist".

Self-Assessment Checklist

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Post-Accident Testing Checklist

The FTA drug and alcohol regulations require testing for prohibited drugs and alcohol in the case of certain transit accidents. To assist in clarifying or identifying these circumstances, the FTA has developed this checklist for use by employers in their program assessments. The checklist includes regulatory requirements, as well as “best practice” recommendations; it should not be construed as the “last word” in regulatory compliance - it merely provides guidance.

- Are post-accident tests conducted for accidents where there is loss of life?
- Are post-accident tests required for non-fatal accidents unless the employee can be completely discounted as a contributing factor?
- ◆ A non-fatal accident is defined as an occurrence associated with the operation of a revenue service vehicle in which:
 - ⇒ an individual suffers a bodily injury and immediately receives medical treatment away from the scene of an accident; or
 - ⇒ one or more vehicles involved incurs disabling damage as the result of the occurrence and is transported away from the scene by a tow truck or other vehicle; or
 - ⇒ the rail vehicle or vessel involved is removed from revenue service.
- ◆ Revenue service vehicles include not only trains, buses and vans, but also non-revenue service commercial motor vehicles and vehicles used by armed security personnel.
- ◆ Disabling damage means damage that prevents any of the vehicles involved from leaving the scene of the occurrence in its usual manner in daylight after simple repairs or damage to the vehicle such that it could have been operated but would have further damaged the vehicle if so operated. Disabling damage does not include damage that could be remedied temporarily at the scene of the occurrence without special tools or parts; tire disablement even if no spare tire is available; or damage to headlights, tail-lights, turn signals, horn, or windshield wipers that makes them inoperative (Fall/Winter *Update*, page 7).
- Are procedures in place to determine when post-accident tests must be performed and who must be tested? Do you use those procedures? Are the decisions documented?
- Are procedures in place to determine if an employee can be completely discounted as a contributing factor? Is a decision not to test documented?
- Are policies and procedures in place to test other safety-sensitive employees not on the vehicle (e.g., maintenance personnel, dispatcher), but whose performance may have contributed to the accident (as determined by the transit agency at the time of the accident)? Are the procedures utilized? Are test decisions documented?
- If tests are performed for accidents that do not meet the FTA definition, are the tests clearly performed under the authority of the transit system using non-USDOT forms?
- Are policies and procedures in place to ensure that post-accident drug and alcohol tests are performed as soon as possible? Are procedures in place to document the reason for delays (greater than 2 hours) in the alcohol test? Are the procedures followed?
- Are procedures in place to discontinue efforts to obtain a drug test if more than 32 hours have passed since the accident or more than eight hours have passed since the accident for an alcohol test? Is the explanation documented?
- In the rare event that you are unable to obtain an FTA drug or alcohol test following an accident, are you aware that you can request the results of tests administered by State or local law enforcement officials (Winter 1999 *Update*, Issue 10, page 2)?
- Does the transit agency have internal policies and procedures in place to conduct testing any time and anywhere individuals are performing safety-sensitive job functions? This includes periods of time outside of the normal business day and locations outside the agency’s normal service area.
- Has the agency designated who will determine whether a post-accident test is required, where to report for testing, and how the employee will be transported to and from the collection site?

(This information was excerpted from the Drug and Alcohol Program Self Assessment Checklist developed for the Transportation Safety Institute by RLS & Associates, Inc.)

Where To Find?.....

49CFR Part 654, Prevention of Alcohol Misuse in Transit Operation

February 15, 1994
Federal Register Vol. 59
Pages 7532-7571

Amended:

May 10, 1995
Federal Register Vol. 60
Pages 24765-24766

Primary Topic: Suspension of Pre-employment Alcohol Testing

August 2, 1995
Federal Register Vol. 60
Pages 39618-39620

Primary Topic: Exemption of Volunteers and Post-Accident Testing Provision

December 8, 1998
Federal Register Vol. 63
Pages 67612-67613

Primary Topic: Use of Law Enforcement Post-Accident Test Results

December 14, 1998
Federal Register Vol. 63
Pages 68818-68819

Primary Topic: Random Alcohol Testing Rate at 10%

January 5, 1999
Federal Register Vol. 64
Pages 425-427

Primary Topic: Safety-Sensitive Maintenance Functions

Technical Corrections:

March 6, 1995
Federal Register Vol. 60
Pages 12296-12300

Primary Topic: Corrections and Clarifications

The information presented on this page should be used to update Chapter 6 of the *Implementation Guidelines*.

FTA/FHWA Comparison

Q & A

Q. If an employee is involved in an accident when driving a transit system maintenance vehicle (i.e., tow truck), the vehicle receives disabling damage, and the employee cannot be completely discounted as a contributing factor, should there be an FTA post-accident test?

A. Yes, if the vehicle requires a CDL to operate. The technical corrections to the regulations published on March 6, 1995 changed the definition of mass transit vehicle to include not only buses and vans, but also non-revenue service commercial motor vehicles and vehicles used by armed security personnel.

The information presented on this page should be used to update Chapter 2 of the *Implementation Guidelines*.

Regulatory Comparison

TOPIC	FTA	FHWA
Drug Testing Regulation	49 CFR Part 653, As Amended	49 CFR Part 382, As Amended
Alcohol Testing Regulation	49 CFR Part 654, As Amended	49 CFR Part 382, As Amended
Testing Procedures	49 CFR Part 40, As Amended	Same
Applicability	Recipients of FTA 49 U.S.C. 5307, 5309, 5311, and 23 U.S.C. 103(e)(4)	◆ Employers who require employees to have CDLs
Drugs Prohibited marijuana, cocaine, amphetamines, opiates, phencyclidine	Same	Same
Alcohol Prohibited ≥0.04 BAC 0.02 to 0.039 BAC	Remove from duty and refer to SAP for evaluation Remove from duty for 8 hours unless re-test < 0.02 BAC	Same Remove from duty for 24 hours
Safety-sensitive Functions	<ul style="list-style-type: none"> ◆ Operating a revenue service vehicle ◆ CDL holders ◆ Dispatch/controlling movement of vehicles ◆ Maintaining a revenue service vehicle or related equipment ◆ Security personnel carrying 	CDL holders when: ◆ driving/driver
Contractors	Applies to all safety-sensitive contractors that “stand in the shoes” of recipient	Each employer is responsible for their own CDL holders
Education and Training Display and Distribute Materials Employee Awareness Training on Drugs Reasonable Suspicion Training of Supervisor	Info and Hotline Numbers Required Same	Add effects and consequences of drug use Not required Same
Policy	Comprehensive; including significant procedural detail	General - less stringent regarding detail
Governing Board Approval	Required	Not Required
Content	Same	Same
Add information on Controlled Substances	Not Required	Required
Certificate of Receipt from Employees	Recommended	Required

FTA/FHWA Comparison

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TOPIC	FTA	FHWA
Testing Categories Pre-employment - drugs only	Result before hire - no waiver	Result before assignment of safety-sensitive duties Waived if certain conditions are met
Reasonable Suspicion Trained supervisor makes specific, extemporaneous observations regarding appearance, speech, behavior, or odor	Same	Same A written record must be prepared within 24 hours of the event Test delays >8 hours result in driver out of service for 24 hours
Post Accident - Fatality Test driver Test others that could have contributed	Required Required	Required Not Required
Post Accident - No Fatality Immediate transport to a medical treatment facility or one or more vehicles receives disabling damage	Unless the employee can be completely discounted as a contributing factor	And the CDL holder receives a citation for a moving traffic violation
Random Scientifically valid method Minimum drug test rate Minimum alcohol test rate	Same 50% 10%	Same 50% 10%
Return-to-duty/Follow-up	Same	Same
Recordkeeping Retention MIS Access to record Previous employer records	Same All covered employers report annually Same Not Required	Same Selected reporting - employers randomly selected Same Obtain records for previous 2 years with employee consent
Compliance Penalties	Suspension of funds	Employer/employee fines and penalties Possibility of issuing an out of service order
Compliance Certification	Required	Not Required
Prohibited Behavior - Alcohol BAC ≥ 0.04 ; consumption on duty 4 hours before performance of safety-sensitive duties; 8 hours following an accident	Same No consumption on-call	Same No possession while on duty
Prohibited Behavior - Drugs at all times	Same	Same Prescription use when affects ability to perform. These are medical disqualifications.
SAP Referral Process	Same	Same

Where To Find?....

FHWA Regulatory Requirements

Office of Motor Carrier Safety
Contact: Ken Rodgers
(202) 366-4016

Trade Associations

Source of Information

Drug and Alcohol Testing Industry Association at
(800) 355-1257

American Association of Medical Review Officers at
(919) 489-5407

American Society of Addiction Medicine at
(301) 656-3920

American College of Occupational and Environmental Medicine at
(847) 228-6850

Substance Abuse Program Administration Association at
(714) 285-4333

The information presented on this page should be used to update Chapter 2 of the *Implementation Guidelines*.

FTA Drug and Alcohol Regulation Updates Index

Where to Find?

49 CFR Part 40, Procedures for
Transportation Workplace Drug
Testing Programs

Amended:

February 15, 1994
Federal Register Vol. 59
Pages 7340-7366
Primary Topic: DOT Alcohol Testing
Procedures
Procedures for Split Sample
Procedures for Drug Testing

August 19, 1994
Federal Register Vol. 59
Pages 42996-43018
Primary Topic: Clarified Urine Specimen
and Collection Procedures and Clarified
Alcohol Testing Procedures

April 19, 1995
Federal Register Vol. 60
Pages 19535-19537
Primary Topic: Standardized Chain of
Custody and Control Form

April 20, 1995
Federal Register Vol. 60
Pages 19675-19681
Primary Topic: Established Procedures for
Use of Non-evidential Alcohol Screening
Devices

The information presented on
this page should be used to
update Chapter 6 of the
Implementation Guidelines.

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Mobile Collectors - Problems to Avoid

Many transit systems and state consortia use mobile collectors to collect urine and breath specimens for the FTA drug and alcohol testing program. The mobile collectors are often associated with or under contract to third party administrators who provide all the testing services as part of a turnkey package. The mobile collectors are often thought of as an economical method for obtaining collection services in areas or situations that have limited collection site alternatives. In most cases, mobile collectors notify the transit system when they will be on-site for random test collections. Many transit systems and statewide consortia find this arrangement convenient as the mobile collector takes over many of the administrative responsibilities associated with the program.

In most cases, mobile collectors provide a collection service that is compliant with the FTA drug and alcohol testing regulations. However, the policies and practices of mobile collectors must be carefully monitored by FTA-regulated employers. A primary area of concern is the predictability and pattern of testing that is often characteristic of mobile collectors. To economically provide testing services, mobile collectors attempt to schedule collections in the most cost-efficient manner possible. Subsequently, collectors often ride a circuit from transit system to transit system and patterns develop.

For example, many transit systems have indicated that their mobile collectors always arrive on site in the mid-morning while neighboring systems expect mid-afternoon arrivals. The timing for arrivals is also dependent on how far away the transit system is from the mobile collector's base of operations. Systems that are far away routinely have arrivals scheduled in the late afternoon.

For many, efficiency also dictates that all a transit system's random tests for a testing period will be conducted on the same day, often with employees waiting in line to provide their specimens. As a result, a pattern of random testing

is evident, making the testing predictable, tests are not spread throughout the testing period, day, or week, and testing is not performed in the early mornings, late evenings, weekends or other times when safety-sensitive functions are being performed, but the mobile collector is not available.

Additionally, mobile collectors that are not in close proximity to the transit system can not typically respond in a timely manner for post-accident or reasonable suspicion tests. In both of these situations, an incident triggers the need for a test and the transit system must respond immediately. In instances where mobile collectors cover large geographic areas, they may be hours away from the site and unable to respond. Some mobile collectors have, erroneously, indicated that as long as they get to the site within eight hours for the alcohol test and thirty-two hours for the drug test, they are meeting the requirements for the post-accident and reasonable suspicion test.

All collections must be performed in a discrete manner that protects the privacy and personal integrity of the individuals being tested. The mobile collectors should use discretion when choosing locations for administering the tests; public or highly visible places such as mall parking lots should be avoided. Likewise, the collectors should take care not to announce that testing is being conducted by displaying inappropriate signage or other advertising at the time or location of testing.



Use of Non-DOT Chain of Custody Forms

The inadvertent use of a non-DOT Drug Test Custody and Control Form is not necessarily a fatal flaw. If the Medical Review Officer determines that the form meets the chain of custody requirements, the MRO can accept the form in lieu of the Federal DOT form. The MRO must determine that the form accurately traces the custody of the specimen and provides a signature of the donor on a copy that is sent to the MRO. **Please note that this interpretation provided by the USDOT Office of Drug and Alcohol Policy and Compliance clarifies and supercedes the one that was provided in the article "Use of Correct Form" printed on page 5 of Issue 9 of the Updates. That article incorrectly stated that the use of non-DOT forms would not be considered valid for FTA tests.**

Where To Find?....

Part 40 Amendments, Cont.

July 16, 1996
Federal Register Vol.61
Pages 37015-37017
Primary Topic: Use of Labs Outside the U. S.

July 17, 1996
Federal Register Vol.61
Pages 37222-37224
Primary Topic: Expansion of SAP Definition

July 19, 1996
Federal Register Vol.61
Pages 37693-37700
Primary Topic: Insufficient Specimen

November 25, 1998
Federal Register Vol. 63
Pages 65128-65129
Primary Topic: Opiate Threshold

The information presented on this page should be used to update Chapter 9 of the *Implementation Guidelines*.

Resource Materials

Who Should Be Receiving This Update?

In an attempt to keep each transit system well informed, we need to reach the correct person within each organization. If you are not responsible for your system's Drug and Alcohol program, please forward this update to the person (s) who is and notify us of the correct listing. If you know of others who would benefit from this publication, please contact us at the following address to include them on the mailing list. This publication is free.

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FTA home page: www.fta.dot.gov

FTA Office of Chief Counsel: www.fta.dot.gov/office/counsel

FTA Office of Safety & Security: <http://transit-safety.volpe.dot.gov>

FTA Letters of Interpretation: www.fta.dot.gov/library/legal

DHHS-Certified Laboratories: Center for Substance Abuse Prevention: www.health.org/wahpl.htm

FTA, Office of Safety and Security: (202) 366-2896

Drug and Alcohol Consortia Manual

Drug and Alcohol Testing Results: 1995, 1996, and 1997 Annual Reports

Random Drug Testing Manual

Implementation Guidelines for Drug and Alcohol Regulations in Mass Transit

Identification of Drug Abuse and/or Alcohol Misuse in the Workplace: An Interactive Training Program

USDOT Drug and Alcohol Documents FAX on Demand: 1 (800) 225-3784

USDOT, Office of Drug Enforcement and Program Compliance: (202) 366-3784

Urine Specimen Collection Procedures Guideline

SAP Procedures Guidelines for Transportation Workplace Drug and Alcohol Testing Programs

Produced by:	Published by:	Edited by:	Illustrated by:
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FTA Drug and Alcohol Regulation Updates

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