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

FTA Drug And Alcohol Regulation *Updates*

Winter 2001 **Issue 17**

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 seventeenth in a series.

Inside....

Part 40 Becomes Final

The U.S. Department of Transportation (DOT) published its revised drug and alcohol testing rule in the Federal Register on December 19, 2000. The 117 page document can be found in Volume 65, No. 244, pages 79462 – 79579. The document is also accessible on-line at http://dms.dot.gov, docket OST-99-6578 or at http://www.dot.gov/ost/dapc. A hard copy of the rule can be obtained by calling the Fax-On-Demand telephone line (1-800-225-3784), and requesting document 151.

The revisions were made to make the regulations easier to understand, incorporate guidance and interpretations of the rule into the text, and to update the rule to address changes in technology, the testing industry, and the DOT's program. The rule resulted from a coordinated effort by the Office of the Secretary, six DOT operating administrations including the Federal Transit Administration (FTA), transportation employers, labor organizations, and drug and alcohol testing service agents. The rule received a "No Gobbledygook Award" from the National Partnership for Reinventing Government for its use of plain language.

The rule, as printed, has two major components. The first component addresses amendments to the current Part 40 that are effective January 18, 2001. The second component presents a comprehensive revision of Part 40 that become effective on August 1, 2001. The Amendments address issues that enhance fairness and integrity of the process that need to be implemented immediately. The revisions address major program improvements that require a longer implementation timeline. The revisions will completely replace the existing Part 40 (including the amendments), previous guidance and all interpretations to date.

A brief synopsis of the major highlights of the amendments and revisions to Part 40 are provided on pages 4 - 7 of this *Updates*. During the next few months, the DOT will issue new guidance on technical aspects of the rule (e.g., revised Medical Review Officer (MRO) and Urine Specimen Collection manuals) and will make numerous presentations around the country. The *Updates* will provide notices of guidance manuals when they become available, and the date and location of major training events.

Harry Saporta Leads FTA Office of Safety & Security....see article on Page 2 for details.

Part 655 Awaits Publication

The Notice of Proposed Rulemaking (NPRM) for 49 CFR Part 655, the much anticipated revision and consolidation of 49 CFR Parts 653 and 654, has fallen victim to a backlog of regulations awaiting print by the Government Printing Office (GPO). At the time of publication, Part 655 had at least two hundred regulations ahead of it in the printing queue. Since Part 655 is viewed as a "non-significant regulation" as defined by the Department's regulatory policies and procedures, other more significant regulations will take precedence.

In addition, the Bush administration has placed a moratorium on rule publication until the rules can be reviewed by the new administration's appointees. Thus, the publication date cannot be anticipated. When published, an electronic copy of the NPRM can be obtained from the GPO's Electronic Bulletin Board Service at (202) 512-1661. Internet users may download the document from the Federal Register's homepage at http://www.nara.gov/fedreg and from the GPO database at http://www.access.gpo.gov/nara. Once published, it is anticipated that commenters will be given at least sixty (60) days to comment on the proposed rules.

For Your Information

Where To Find?.....

49 CFR 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 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 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 3 of the *Implementation Guidelines*.

Saporta Leads FTA Office of Safety and Security

Harry Saporta joined FTA on November 27, 2000 as the Director of the Office of Safety and Security. Mr. Saporta brings a variety of experience and expertise in the transit industry having served for the past nineteen years as Manager, Safety Programs for the Tri-County Metropolitan Transportation District of Oregon. Included in his duties were management of the alcohol and drug testing, safety certification, design review of new bus and rail system, and emergency management.

FTA Offers Seminars

Given the success of the four FTA substance abuse seminars held last year, FTA will be offering four additional sessions this year. The two-day lecture format will remain the same, but the content will reflect the new rule changes.

The first day will be a presentation by a representative of the DOT Office of the Secretary about the new Part 40. The second day will include a presentation by Mark Snider, FTA Drug and Alcohol Program Manager, regarding the proposed revisions and consolidation of Parts 653 and 654. The final session will be wrapped up with a presentation on the audit process. Questions and answers will be allowed to the extent practical.

The seminars will be presented free of charge and will be open to FTA recipients, subrecipients, safety-sensitive contractors, their respective service agents, and all others involved in the implementation of the FTA drug and alcohol regulations. Attendees will be responsible for their travel arrangements and expenses. Reservations should be made as least one month in advance of the seminar to obtain the conference rate.

All attendees that participate in the entire two-day seminar will receive a certificate of course completion from the Transportation Safety Institute (TSI). The seminars will be offered at the following locations:

Las Vegas, NV	Stardust Resort & Casino	March 6 – 7, 2001
St. Louis, MO	Marriott Pavilion Downtown	April 11 – 12, 2001
Orlando, FL	Orlando Airport Marriott	June 12 – 13, 2001
Pittsburgh, PA	Westin William Penn Hotel	August 15 – 16, 2001

For further information, contact Jennifer Whalley of the Volpe Center National Transportation Systems Center at (617) 494-2686, or e-mail at Whalley@volpe.dot.gov.

TSI Offers Training

The Transportation Safety Institute will once again offer the Substance Abuse Management & Program Compliance course on a cost-recovery basis during FY 2001. The course is designed to assist participants conduct an evaluation and self-assessment of their respective agency's substance abuse program and compliance with FTA regulations. The 3-day course involves lecture and group discussion. Time is allowed for participants to evaluate their programs and ask questions. The course is very comprehensive and has been updated to include the new Part 40 revisions.

Transit agency substance abuse program managers, human resource managers, safety managers, State DOT representatives, and third-party contractors should attend. If you are interested in attending, hosting, or funding a program, please contact TSI at (405) 954-3682. At the time of publication, six course dates in 2001 remained open.

For Your Information

Supreme Court Decides Case

On November 2, 2001 the United States Supreme Court decided the *Eastern Associated Coal Corp. v. United Mine Workers of America* case in which the petitioner asked the court to clarify when courts can overrule arbitrators' decisions when they are contrary to public policy considerations. In this case, an arbitrator reinstated a coal-company truck driver to his safety-sensitive position on two separate occasions following positive drug tests for marijuana concluding that the employer did not have "just cause" to discharge the employee.

The court concluded that the reinstatement of the employee was not contrary to public policy since the Department of Transportation (DOT) regulations leave disciplinary action up to the discretion of the employer. The regulations state the conditions under which an individual that violates the rules (i.e., positive test result) may be returned to safety-sensitive positions. Since the collective bargaining agreement granted the arbitrator authority to interpret the meaning of their contract's language, including such words as "just cause" and the employee was required to successfully complete the return-to-duty- process, the arbitrator did not act outside the scope of his contractually delegated authority and did not violate any law or regulation. The arbitrator's award is consistent with DOT rules requiring completion of substance abuse treatment before returning to work following a positive test result.

Testing Rate Remains The Same

The drug and alcohol random testing rates for employers subject to FTA drug and alcohol testing rules will remain the same for calendar year 2001. Thus, random drug tests must be conducted at a **fifty** percent rate and random alcohol tests must be conducted at a **ten** percent rate. The random rates are established each year based on the previous two-year industry-wide test results. The industry test results are determined from the MIS reports submitted each year by individual FTA covered employers.

The official FTA notice of the drug and alcohol random test rates for 2001 will soon be published in the Federal Register and on FTA's homepage at *http://transit-safety.volpe.dot.gov.*

MIS Reports

The 2000 FTA Drug and Alcohol MIS reporting material packages were mailed on December 15, 2000. The packages included the MIS forms, reporting software and instructions. Grantees and State DOTs are responsible for the distribution of copies to their contractors and subrecipients, respectively. Additional reporting materials can be downloaded from the Drug and Alcohol MIS (DAMIS) web site http://transit-safety.volpe.dot.gov/DAMIS or can be obtained by calling he Drug and Alcohol MIS Project Office at (617) 494-6336.

Completed MIS data forms or their diskette equivalent must be submitted to the Drug and Alcohol MIS Project Office by March 15, 2001. FTA encourages employers to submit electronically if possible to facilitate report submission, validation, and analysis. Electronic submissions can also be processed more quickly and can minimize data entry and manipulation errors.

Employers are instructed to follow the reporting directions precisely and review the data request terminology to avoid possible reporting mistakes and subsequent follow-up calls by data analysts. If your submittal includes any entries that require additional explanation, please attach a letter of explanation.

Where To Find?.....

49 CFR 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 Chapters 9 of the *Implementation Guidelines*.

Part 40 Amendments

Where to Find? .....

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

Revised:
December 19, 2000
Federal Register Vol. 65,
Pages 79462 - 79579.
Primary Topic: Procedures for Transportation Workplace Drug and Alcohol Testing Program Revised Final Rule (49 CFR Part 40)

The information presented on this page should be used to update Chapters 7 and 8 of the *Implementation Guidelines.*

Part 40 Amendment Summary - January 18, 2001

On January 18, 2001 amendments to the current Part 40 went into effect. The amendments include the following provisions:

- The DOT Office of Drug and Alcohol Policy and Compliance (ODAPC) is responsible for coordinating drug and alcohol testing program matters within the Department and providing information concerning the implementation of Part 40. The ODAPC is the only office within the DOT that can make official and authoritative interpretations concerning this rule. [40.203]
- Specimen validity testing is the evaluation of the specimen to determine if it is consistent with normal human urine. Laboratories are authorized to conduct validity testing following the requirements that are specified. These requirements will become mandatory August 1, 2001 or following the Department of Health and Human Services' (HHS) publication of its mandatory requirements for validity testing, whichever is later. [40.205 – 40.207]
- Validity tests include tests for creatinine concentration, specific gravity, pH, and substances that may be used to adulterate a specimen. The regulation does not list the adulterants, but rather includes by reference the substances identified in current HHS requirements or specimen validity guidance. Criteria are established for determining when a specimen is dilute and adulterated. [40.207 - 40.211]
- Primary and split specimens that are reported as positive, adulterated, substituted, or invalid must be retained for a minimum of one year. The laboratory must retain the specimens longer if requested to do so by an MRO, employee, employer or a DOT agency. [40.213]
- Tests that result in findings of adulteration and substitution require review by a qualified MRO. The employee will also be offered the opportunity to have the split specimen tested. The MRO must follow the same procedures for verification of a confirmed positive drug test including providing an explanation of the laboratory finding, addressing technical questions raised by the employee, and offering the employee the opportunity to present a legitimate medical explanation for the laboratory result. The employee has the burden of proof and must demonstrate that the adulterant entered the specimen through physiological means. The same burden of proof and demonstration requirement must be met for substituted specimens as well. [40.215]

- The MRO has full discretion in the use of his/her professional judgment to determine a legitimate medical explanation for an adulterated or substitutional specimen. If a reasonable explanation may exist, the MRO must direct the employee to have a medical evaluation by a "referral physician" that has expertise in the medical issues raised. The employee must also demonstrate in a controlled environment how the results were possible. The final determination of whether there is a legitimate medical explanation is that of the MRO. [40.215]
- The DOT may institute a Public Interest Exclusion (PIE) that excludes service agents from participating in the DOT's drug and alcohol testing program if they have serious noncompliance violations. PIE's will be used to remedy situations if a service agent has failed or refused to provide drug or alcohol testing services consistent with the requirements of Part 40 or a DOT agency (i.e., FTA) drug and alcohol regulation. The DOT may also issue a PIE if a service agent has failed to cooperate with DOT agency representatives concerning inspections, complaint investigations, compliance and enforcement reviews, or requests for documentation. [Subpart F]

Part 40 Revisions

Part 40 Revision Summary - August 1, 2001

Part 40 has been significantly restructured and divided into eighteen Subparts and six appendices. The rule uses a question-answer format, with language specifically directing particular parties to take particular actions.

Each of the major revisions is summarized on this and the following pages. The reader should note, however, that the revisions are extensive and only the major highlights are discussed herein. Readers are strongly encouraged to read the regulatory text including the preamble and section-by-section discussion to obtain their own understanding of the regulatory requirements.

Employer Responsibilities

- All agreements and arrangements, written or unwritten, between employers and service agents concerning the implementation of DOT drug and alcohol testing requirements are deemed, as a matter of law, to require compliance with all applicable provisions of the DOT/FTA drug and alcohol testing regulations.
- As an employer, you can contract out your drug ad alcohol testing program functions, but you cannot contract away your compliance responsibilities. An employer's good faith use of a service agent is not a defense to a DOT enforcement action.
- The regulation does not allow an employer to "stand down" an employee (temporarily remove from performing safety-related duties) while awaiting verification from a medical review officer of a laboratory confirmed positive unless the employer has received a waiver from the appropriate DOT operating administration (e.g., FTA). Procedures for obtaining a waiver (40.21) are provided. The conditions for obtaining a waiver include an important measure to continue to protect employee confidentiality and to allow an employee to be paid during this period.
- All DOT employers are required to check on the drug and alcohol testing background of new hires and other employees beginning safety-sensitive work. Employers are required to get written consent from the applicant. The employer must send the request for information and the employee's consent to all other DOT-regulated employers for whom the employee had worked within the previous two years. The employer cannot let the employee perform safety-sensitive duties for more than 30 days unless the employer has obtained, or made and documented a good faith effort to obtain the information. If the employer finds that an employee has a violation on his record and has not completed the return-to-duty process, the employer must immediately stop using the employee to perform safety sensitive functions.
- DOT employers are required to provide the information when requested. The method for providing such information in a confidential manner is defined.
- Employers must also ask job applicants if they have previously failed or refused a DOT drug or alcohol pre-employment test within the previous two years.

Collection Sites

- Collection site preparation and collection processes were expanded and clarified to protect the security and integrity of the collection process.
- The revised Federal Drug Testing Custody and Control Form (CCF) must be used on all DOT collections by August 1, 2001. Use of a non-DOT form in rare circumstances, is a correctable flaw. However, use of a DOT CCF for a non-DOT test, may result in a DOT enforcement action.

DHHS Labs

The current list of DHHS certified labs is published the first week of each month and is printed in the Federal Register under the Substance Abuse and Mental Health Services Administration heading (SAMHSA). Only those labs certified can be used for FTA drug testing. The list should be checked monthly as new labs are being added and others are being removed.
Website location: http:/www.health.org/workplace.

To verify the certification status of laboratory, DHHS has established a telephone HELPLINE (800) 843-4971.

Conforming Products List

Evidential Breath Testing (EBT) Devices
July 21, 2000
Federal Register Vol.65
Pages 45419 - 45423
Primary Topic: Conforming Products List (CPL)
Website location: www.nhtsa.gov/people/injury/alcohol

Note: This list will be updated periodically.

Non-evidential Testing Devices
August 15, 1995
Federal Register Vol.60
Pages 42214-42215
Primary Topic: Initial Alcohol Screening Devices

Note: This list will be updated periodically.

The information presented on this page should be used to update Chapter 7 & 8 of the *Implementation Guidelines.*

Part 40 Revisions

Q & A

Q: With food products containing hemp available in some locations, can the use of these hemp containing products be used to defend a positive marijuana test?

A: No. Such statements cannot be used to defend a positive marijuana finding. Part 40.151 (f) states that "(The MRO) must not accept an assertion of consumption or other use of a hemp or other non-prescription marijuana-related product as a basis of verifying a marijuana test negative."

The information presented on this page should be used to update Chapter 7 & 8 of the *Implementation Guidelines*.

Part 40 Revision Summary - Continued

Urine Collection Personnel

- Urine collection personnel must be knowledgeable about Part 40, DOT regulations, and the current "DOT Urine Specimen Collection Procedures Guidelines." They must keep current.
- Collectors must receive qualification training that addresses all steps necessary to complete a collection correctly including problem corrections (e.g., shy bladder, temperature out of range), fatal flaws and corrective actions. Collectors must also demonstrate proficiency by completing five consecutive error-free mock collections—two of which are uneventful, one with insufficient volume, one temperature out of range, and one employee refuses to sign. The collector's demonstration must be monitored and evaluated by a qualified instructor. Current collectors have until January 31, 2003 to complete qualification training. New collectors must complete the training before beginning to perform collector functions.
- Refresher training is required no less frequently than every five years. Error correction training is required every time the collector makes a mistake in the collection process that causes a test to be cancelled. Three error-free mock collections (e.g., two on the subject matter of the error and one uneventful) must also be performed.

Drug Test Collections

- The collection process including detailed procedures for observed and monitored collections are defined. The regulation clearly distinguishes between the tasks that the collector must perform from those performed by the employee.
- When the employee enters the collection site, the testing process must begin without undue delay.
- If the employee is at the collection site for both a drug and alcohol test, to the greatest extent possible, the collector should complete the alcohol test first.
- Employees must be directed to empty his/her pockets and display them to the collector. Employees are not required to remove his/her boots.
- In instances of insufficient volume and temperature out of range, the specimen should be sent to the laboratory along with the second specimen. The first specimen should not be discarded.
- Observed collections are required if the specimen is invalid and there is not adequate medical explanation; the original positive, adulterated or substituted test result was cancelled because the test of the split specimen could not be performed; the collector observes evidence of an employee's attempt to tamper with a specimen; temperature on the original specimen was out of range; or, the original specimen appeared to have been tampered with. Observed collections are permitted on return-to-duty and/or follow-up tests. Observed collections are not permitted following dilute tests.
- The collection site must transmit the CCF to the MRO and the employer with 24 hours or during the next business day. Likewise, specimens must be shipped to a laboratory within 24 hours or during the next business day.

Role of C/TPAs

- At the employer's discretion, Consortiums/Third Party Administrators (C/TPA) may act as an intermediary in transmitting drug test results from an MRO to employers. CPTAs must maintain confidentiality and must meet specified time requirements for reporting information to the employer. C/TPAs may not act as an intermediary between a laboratory and the MRO or between the BAT and the employer following a positive alcohol test result.
- C/TPAs may receive and maintain drug and alcohol testing records (e.g., test results and program operation records) without the employee's consent.
- C/TPAs may operate the employer's random testing pool and assist with other types of testing, but may not act as the designated employer representative (DER).

Part 40 Revisions

Drug Testing Laboratories

- Laboratories are required to comply with HHS guidelines concerning accessioning and processing specimens. Laboratories will be required to follow HHS guidelines for validity testing upon their publication or by August 1, 2001 whichever is later (See explanation provided in article on Part 40 amendments, Page 4).
- Laboratories are required to retain a specimen for five working days while waiting for the correction of a correctable flaw. Primary and split specimens must be stored for at least one year.
- Employers or C/TPAs with an aggregate of less than 2000 DOT-covered employees are no longer required to submit blind specimens to a laboratory. Employers or C/TPAs with an aggregate of 2000 or more DOT Covered employees must send a number of blind specimens equivalent to one percent of the total specimens sent to a laboratory up to a maximum of 50 blind specimens in each quarter. The blind specimens submissions must be spread throughout the year. Approximately 75% must be drug-free, 15% must be positive for one or more drugs and 10% must be either adulterated or substituted.
- Laboratories must submit an aggregate statistical summary to each employer on a semi-annual basis. These reports replace the quarterly statistical summaries previously required.

Medical Review Officers

- MROs must be knowledgeable about and have clinical experience in substances abuse disorders including knowledge of alternative medical explanations for laboratory test results. MROs must be knowledgeable about issues related to adulterated and substituted specimens, and must be knowledgeable about Part 40, DOT agency regulations, and the DOT MRO Guidelines.
- MROs are required to take a formal training course and are required to pass an examination administered by a nationally recognized MRO professional certification board. The initial qualification training for existing MROs must be completed by January 31, 2003. Individuals that become MROs after August 1, 2001 must meet the qualification training requirement before MRO functions can be performed.
- MROs are required to complete twelve professional development hours of training relevant to MRO functions every three years.

Split Specimen Tests

- Split specimen requests do not need to be in writing.
- Employers must not condition split specimen tests on the employee's direct payment to the MRO or laboratory or the employee's agreement to reimburse the employer for the cost of the testing. The employer, however, may seek payment or reimbursement of the cost from the employee.

Alcohol Testing

- BAT/STTs are required to undergo qualification training, demonstrate proficiency on equipment operation, complete refresher training every five years and complete error correction training following cancelled tests.
- Alcohol tests are limited to an initial attempt and two more re-attempts.
- Tests must be performed without undue delay.

Substance Abuse Professionals

- SAPs must have basic knowledge about the SAP functions as they relate to employer interests in safety-sensitive duties.
- SAPs must receive qualification training and satisfactorily complete an examination by a nationally recognized professional organization by December 31, 2003. SAPs must complete 12 hours of continuing education every three years.

Q & A

Q: Can an SAP base recommended treatment on a statement from the employee that a positive marijuana test was only the result of using hemp products?

A: No. The SAP is prohibited from taking statements of the use of hemp related products into consideration when determining recommended treatment from an employee who tests positive for marijuana, (Part 40.293 (f) (2)).

The information presented on this page should be used to update Chapter 7 & 8 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 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/labs/index.htm

FTA, Office of Safety and Security: (202) 366-2896
Drug and Alcohol Consortia Manual
Drug and Alcohol Testing Results: 1995, 1996, 1997, and 1998 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

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