

QUESTION:

How should the employer's decision to have a C/TPA act as intermediary in the handling of drug test results be documented?

ANSWER:

- When an employer chooses to use the C/TPA as the intermediary in the transmission of the MRO's verified drug test results, this decision should be communicated from the employer to the MRO and the C/TPA.
- We advise the MRO to obtain some documentation of the employer's decision prior to sending results through the C/TPA.
- Documentation could be in the form of a letter, an email, or record of a telephone conversation with the employer.
- DOT also recommends that MROs maintain listings of the names, addresses, and phone numbers of C/TPA points of contact.

QUESTION:

May the MRO's address entered on the CCF be a post-office box number only?

ANSWER:

- No. The address must contain at least a number and street address.
- The reason for this requirement is that CCFs are often delivered by courier or messenger services who do not deliver items to post office box addresses.
- The post-office box can be included, but not in lieu of the number and street address.

QUESTION:

Where can billing information be entered onto the Federal Drug Testing Custody and Control Form (CCF)?

ANSWER:

- 40.45(c)(1) states that the CCF may include billing information if the information is in the area outside the border of the form.
- Therefore, if account codes or collection site codes are entered, they must be placed outside the border, only.
- CCFs with this information pre-printed inside the border (i.e., in the Step 1 box) may be used until the supply of these forms is exhausted. CCFs produced or re-ordered after February 15, 2002, must not have this information inside the border.
- No corrective action is needed nor will a result be impacted if the CCF contains this information inside the border. However, employers and service providers may be subject to enforcement action if this requirement is not met.

QUESTION:

What actual address is required for “Collection Site Address” in Step 1 of the CCF, and what telephone number should the collector provide?

ANSWER:

- The collection site address should reflect the location where the collection takes place. If the collection takes place at a clinic, the actual address of that clinic should be used: not a corporate or a “main office” address of the clinic/collection company.
- If the collection takes place on-site at the employer’s place of business (e.g., a bus terminal, a rail yard), the actual address of the employer site should be used.
- If the collection takes place in a “mobile unit” or takes place at an accident site, the collector should enter the actual location address of the collection (or as near an approximation as possible, under the circumstances).
- The required collector telephone number should be the number at which it is most likely that the laboratory, MRO, or employer, if necessary, may contact the collector and the collector’s supervisor.
- Pre-printing certain information onto the CCF is problematic if the information is subject to change.

QUESTION:

Can a collector mark through pre-printed employer, MRO, collection site, and/or laboratory information on the CCF if that information is not accurate for a particular collection?

ANSWER:

- Yes. When the collector has no “blank” CCFs and the CCFs on-hand contain inaccurate pre-printed employer, MRO, collection site, and/or laboratory information, the collector is permitted to “line through” the inaccurate information and insert legibly the proper information.
- The likelihood of a collection site having CCFs with inaccurate information increases with unexpected collection events (e.g., employee arrives unannounced for post-accident testing).
- If the specimen will be sent to a laboratory different than the one pre-printed on the available CCF, it becomes important for the collector to modify the CCF so that it reflects the name and address of the laboratory to which the specimen will actually be sent. It is also important for the collector to line through any pre-printed billing code and insert the appropriate one, if it is available.
- Finally, laboratories should honor collection site requests to provide an adequate number of “blank” CCFs for use during unexpected collection events. It is important to note that the DOT permits overprinting or pre-printing of CCFs in an effort to streamline the entire testing process, not to limit the distribution of the forms to collection sites