

How Can I Become a Collector For DOT Drug Testing?

How do I become qualified to be a collector?

To become qualified as a collector, you must be knowledgeable about Part 40 regulations, the current “DOT Urine Specimen Collection Procedures Guidelines,” and DOT agency regulations applicable to the employers for whom you will perform collections, and you must keep current on any changes to these materials. You must also (1) successfully complete a qualification training program and (2) pass a monitored proficiency demonstration, as required by DOT regulations [See 49 CFR Part 40.33 (b-c), effective August 1, 2001]. Please note: there is no “grandfather” clause or waiver from this requirement.

A collector’s qualifications are not location/collection site specific, and their eligibility will follow them anywhere DOT Agency regulated urine specimens are collected.

There is no requirement for qualified collectors to register or to be on any federally-maintained or federally-sponsored list, but they are required to maintain (for Federal inspection) documentation of successful completion of their training and proficiency demonstration requirements.

Do I need to become “certified” to conduct DOT urine collections or operate a DOT collection site for drug testing?

No, DOT does not require “certification” of a collector or a collection site before they can collect urine specimens for DOT drug tests. In fact, only individual collectors (not collection sites) may become qualified to collect DOT urine specimens.

What should be the content of the qualification training program and who may conduct it?

While the Department has not published a curriculum for urine collection training, the DOT expects trainers to base their curriculum on both DOT regulations and the latest version of DOT’s publication, “Urine Specimen Collection Guidelines”. (Information on how to access the latest copy of the DOT regulations and the collection guidelines can be found in the last question of this document.)

The qualification training [See 40.33(b)] must contain the following elements:

Qualification Training:

- Knowledge about Part 40 collection procedures,
- All the steps necessary to conduct a proper collection,
- How to properly fill out a federal collection form (Custody and Control Form, or CCF),
- How to handle problem collections (shy bladder, attempts to tamper with the test, etc.),

- Information about fatal and correctable flaws in collections and collection paperwork, and
- The collector's responsibility for maintaining the integrity and credibility of the collection process, privacy, and specimen security.

Anyone can provide the qualification training described above. The trainer does not need to be an experienced or qualified collector, or the same person who oversees the proficiency demonstration, or be a person at all (such as in an internet course, for example). The course material may be taught in person, conducted by video, by computer programs, via the internet, by video conference, or by other equivalent means. Also, there is no mandatory time requirement for this portion of the training.

Although an examination is not required, to demonstrate compliance with the qualification training requirement, it is recommended that the course have built in some means of ensuring that the information has been successfully learned.

What should be the content of the collector proficiency demonstration and who can conduct it?

After successfully completing the qualification training program, the collector-to-be must then complete five consecutive error-free mock collections under the direct observation of a qualified monitor. [See 40.33(c)]

The five mock collections must include the following types of collections, in any order:

- 2 uneventful/routine,
- 1 covering an insufficient quantity of urine,
- 1 covering a temperature out of range, and
- 1 covering a refusal to sign the CCF paperwork and initial the bottle seal.

These mock collections are intended to portray a real event conducted with someone (possibly even the instructor) acting as the donor. The collections must be directly observed in real-time by the instructor or clearly able to be monitored in real-time through a video link or equivalent and allow direct interaction between instructor and trainee [See 40.33(c)(2)]. The use of a "check list" during the mock collections would be acceptable if the use of a check list was part of the training the collector received and was to be used in real-life collections.

The proficiency monitor/evaluator must be an already qualified collector who either has also been conducting DOT collections for at least a year, conducted Part 40 collector training for a year, or has successfully completed a train-the-trainer course. This person must also attest in writing that the mock collections were error-free. [See 40.33(c)(2)]

What kind of documentation must I keep to show that I'm qualified?

Most organizations/trainers should provide you with a certificate upon successfully completing the entire course. However, collectors must be prepared to document to DOT Agency inspectors, employers, and employer designated service agents who may contract for their services (such as C/TPAs) that they are currently eligible to collect DOT specimens. [See 40.33(g)]

On request, you must be prepared to provide sufficient detail on the content of the training and proficiency demonstration so that the Federal Inspector can be confident that you fully met the requirements of the regulation. Examples may include training graduation certificates and/or letters signed by the qualified trainer/observer indicating you attended and successfully completed the course.

Do I have to go through refresher training?

Yes. Each qualified collector must go through refresher training every five (5) years in order to remain eligible to collect DOT specimens. [See 40.33(e)] The content of the refresher training must be the same or equivalent to your initial training and proficiency demonstration content. It is expected that you stay current with any changes to the DOT regulations and not wait for the refresher training to learn about them.

Does DOT offer collector training?

DOT does not offer collector training, maintain lists of training programs or qualified trainers; nor does it approve, certify or recommend the training programs of any organization or entity.

Collection sites may conduct their own training or solicit an outside organization or entity (e.g. professional training service) to do its training. To find such a training service, you may search the yellow pages, the internet or contact industry associations or organizations.

Once I'm qualified, how do I get business?

Becoming a collector was a business decision. As such, you will need to grow your business according to your business model/plan. Transportation trade shows, the internet or the local yellow pages are a good place to start looking for DOT regulated clients.

Where can I get more information on the collection regulations, guidelines for collectors and other DOT regulations?

Visit DOT's Office of Drug & Alcohol Policy & Compliance (ODAPC) website at www.dot.gov/ost/dapc/. From the home page you can link to the "Urine Collection Personnel" page which will not only give you direct access to those sections of Part 40 that cover collectors and collection procedures, but will also allow you to download the latest copy of Part 40 and the collection guidelines.

Also, the home page will provide you with various links to information and documents related to all aspects of Part 40, as well as, the DOT Agency regulations.

If you do not have web access, you may call 202-366-3784 and ask for a hardcopy of Part 40 and/or the collection guidelines to be sent to you or you can access the DOT's fax-on-demand system at 800-225-3784.