

**Office of Drug Enforcement and Program Compliance**  
**49 CFR Part 40 Interpretation**

**Question:** "Can a Doctor of Chiropractic, holding a Certified Addiction Professional Degree, served as a Medical Review Officer (MRO)?"

**Response:** Section 40.3 states: *"Medical Review Officer (MRO). A licensed physician (medical doctor or doctor of osteopathy) responsible for receiving laboratory results generated by an employer's drug testing program who has knowledge of substance abuse disorders and has appropriate medical training to interpret and evaluate an individual's confirmed positive test result together with his or her medical history and any other relevant biomedical information."*

In addition section 40.33(2)(b) states: *"The MRO shall be a licensed physician with knowledge of substance abuse disorders and may be an employee of a transportation employer or a private physician retained for this purpose."*

A Doctor of Chiropractic, holding a Certified Addiction Professional Degree, is not considered to be a licensed medical doctor or doctor of osteopathy and, therefore, cannot serve as an MRO.