

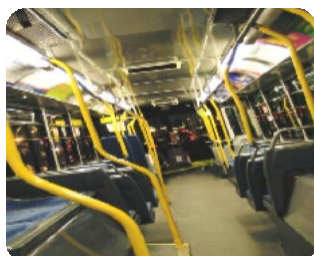
U.S. Department of Transportation
Office of the Secretary

Office of Drug and Alcohol Policy and Compliance



**What Employers Need
To Know About
Monitoring Collection Sites**

[Guidance and Best Practices]



[This page intentionally left blank]

Table of Contents

Introduction.....	4
Overview	6
Level 1: What can I do without visiting the collection site? – The Desk Audit	7
Overview	7
What I should look for during a desk audit?	7
What are the basics I need to know about the collections?.....	8
What do I look for on the testing forms?	9
<i>General</i>	9
<i>For alcohol tests</i>	10
<i>For drug tests:</i>	10
<i>Complete the Testing Event</i>	11
<i>Error Correction Training:</i>	12
<i>For Refusals</i>	12
Level 2 – What if I have some time to visit a collection site, but am not sure what to look for when I am there? – The Basics of Collection Site Visits	13
Overview	13
Items to review annually	14
Level 3 – How would I conduct an expanded collection site visit? – Enhanced Collection Site Review	15
Overview	15
Staying Proactive	15
APPENDIX	17

Introduction

Do you employ safety-sensitive employees who must take drug and alcohol tests regulated by the United States Department of Transportation (DOT)? If so, this brochure can help you understand what you can do to monitor the activities of the collection sites that are performing those drug and alcohol test collections. Having an effective substance abuse prevention and testing program is vital to your organization's success and to public safety. An excellent drug and alcohol testing program starts with a collection site that fully meets all requirements for the safety, privacy, security and integrity of the testing site and the testing process. As the drug and alcohol program manager for the employer, you are the employer's representative and are responsible for ensuring that the collections are performed in compliance with the various DOT regulations.

Ensuring the fairness, accuracy, security and integrity of the specimen collection process is fundamental to transportation safety. If you allow your collection sites to slip below the requirements that ensure safety and security for the required collections, you open the door to those who want to mask their illicit drug use by cheating or otherwise subverting a test so that they can continue to use illegal drugs undetected. At the same time, those employees without a previous violation have a reasonable expectation of privacy while providing a sample. As the employer, it is your responsibility to play a key role in quality assurance and consistency in the success of the DOT-regulated collections performed for your company.

We realize that running the drug and alcohol testing program for your company may not be your full-time job, so you need efficient and cost-effective strategies for monitoring a collection site in the least amount of time and most efficient way. Monitoring your collection site does not have to be difficult – but it does need to be smart and efficient so that it produces the desired outcome with the minimal amount of time, so that you can still have time for your other workplace responsibilities.

We recognize that monitoring your collection site can involve several varying levels of oversight depending upon how much time you can spend accomplishing this task. In this brochure, we will describe three levels of collection site monitoring commonly used in the transportation industry. The three levels are: Level 1 – the desk audit; Level 2 – collections site visits; Level 3 – enhanced collection site review.

Based on the number and locations of the collection sites your company uses, your resources and availability, and any problems that have occurred at collection sites, you can choose the levels that will work most effectively for your program. In some situations, it can be reasonable to mix and match your approaches. For example, for small numbers of trouble-free collection sites, an annual desk audit might be sufficient; larger volume sites or sites that have more problems might call for more active oversight. Ideally, you want to provide the highest degree of oversight, as explained in Level 3. The employer is likely to be held responsible for the actions of the collector(s), so it is important for you to take the steps necessary to monitor your collectors at the highest level possible.

This is not a legal document that adds to or makes any official interpretations of DOT rules. This publication is for educational purposes only. This brochure is a supplement to and should be read along with our earlier publication for employers, —What Employers Need to Know About DOT Drug & Alcohol Testing at: http://www.transportation.gov/odapc/employer_handbook.

For questions about the rules, please contact the Office of Drug and Alcohol Policy and Compliance (ODAPC) at 202.366.3784 or e-mail us at ODAPCWebMail@dot.gov. You can find contact information about DOT Agency and United States Coast Guard drug and alcohol program managers on our website at: <http://www.transportation.gov/odapc/agencies>

[This space intentionally left blank]

Overview

As an employer, especially as the Designated Employer Representative (DER), you will find Appendix C of our Employer's Handbook (http://www.transportation.gov/odapc/employer_handbook) to be a good place to find the basic administrative details of what to ask of and expect from your collection sites. It is also a good resource regarding what to ask about completing the Federal Drug Testing Collection Custody and Control Form (CCF) and the DOT Alcohol Testing Form (ATF). For your convenience, we have reprinted that information here:

The following is a list of the most common service agents and some starting points to help you select them:

URINE SPECIMEN COLLECTORS, BREATH ALCOHOL TECHNICIANS (BATs) AND SCREENING TEST TECHNICIANS (STTs)

There are a number of things to look for when selecting collectors, BATs, and STTs:

1. Ensure they offer the services you want. For example, do they offer both urine collections and alcohol testing? Will they come to your worksite to conduct the testing if that is what you want?
2. Make sure they are open for business at the times you need them. Are they open during the times your employees are on duty and may need to have tests? Will they remain open after their closing time if an employee presents an insufficient amount of urine?
3. Make sure they show you training documentation for their personnel.
4. Have them explain their procedures for notifying you or the DER of test results – especially refusals, positive alcohol tests, and problems with employees.
5. Check-out their collection sites for security and site integrity. [See the ODAPC 10 Steps to Collection Site Security and Integrity [video](#)].
6. Determine if their facilities are conveniently located and offer parking.
7. Find out if they have the correct CCFs, ATFs, collection kits, and alcohol test equipment.
8. Ask if they have a fax machine and intend to use it immediately after each DOT collection and/or alcohol test to appropriately distribute the paperwork.
9. Have them explain their procedures for collecting specimens under direct observation.
10. Ask if they have [DOT's Urine Specimen Collection Guidelines, Part 40](#), and the ODAPC 10 Steps to Collection Site Security and Integrity [poster](#) on the premises.
11. See if they have references from other employers and records of DOT inspections and audits.

A best practice is to visit collection facilities from time to time, when your employees are there for tests to see for yourself how the process is going. You may discover that the site does not ensure the integrity of the process or you may find that they do ensure the integrity of the process. You should also talk with your MRO to see how often tests are cancelled because of collector errors for any DOT-regulated employer. If collection companies are not doing a good job for you, look elsewhere for the service. Don't risk being out of compliance with the various DOT regulations.

Note: The points above and in this brochure are fundamental points for you to cover, regardless of which level of monitoring you choose to do and whether the collections occur at your place of business or at an off-site collection site facility.

Level 1: What can I do without visiting the collection site? – The Desk Audit

Overview

If monitoring your collection site(s) is a new task for you, the most basic level of monitoring is a desk audit, which allows you to provide a basic level of monitoring from within your office. Small employers or those with very limited resources may want to use this level of review.

One of your first steps is to establish the basics. For example: the name, location, and distance to your collection site and confirm that the facility and its manager(s) are aware that they are providing you with DOT-regulated drug and alcohol tests. Ask them what their hours of operation are to determine their availability during your company's hours of operation. Will the site be able to conduct testing during all of the hours your employees are performing safety-sensitive operations? How will they handle events that occur after their normal operating hours, such as reasonable cause/reasonable suspicion tests and post-accident testing?

Also, think about whether the collection site knows how to contact you about any problems. Are you available to the collection site at any time that your collections are occurring?

What I should look for during a desk audit?

When you have established the basics, you must now solidify the expectations between you and the collection site. Many employers take this for granted, and only discover that their expectations are not met after it is too late for corrections. You need to establish and communicate your specific expectations to ensure that the requirements for the integrity and accuracy of DOT-regulated collections are being met. You also need to make sure that the collection site's capabilities meet your expectations. Whenever a collection site is not meeting your expectations, you need to revisit the issues and require the collection site to revise its procedures to meet your expectations under the various DOT regulations.

Here are some best practices and expectations to communicate to your collection site(s):

1. Whether or not you, as the employer, can set appointments for each collection;
2. The name of your primary point of contact at the collection site for questions or concerns;
3. Whether the collection site or you will keep the supply of testing forms (pre-printed CCFs and/or ATFs) to be used (often it will be more convenient for the collection site to keep the forms in stock);
4. A definite set of phone numbers, emails, fax numbers, etc. for the collection site to contact you or your designee at all times (on Step 1 of the CCF);
5. The method and frequency by which the collection site will send paperwork and other information to you;
6. Use of employer-specific CCFs for your employees;
7. Establish a secure way of communicating orally and/or by other means between you and the collection site. For example, set up a password for confirming identities between you and the collection site;

8. Whether or not the collection site has the ability to conduct both drug and alcohol testing (if the collection site cannot perform DOT alcohol tests, you will need to establish a method to do so elsewhere);
9. What the collection site will do in the event that a directly observed collection is needed, be sure to ask what they will do to obtain an observer;
10. What the collection site will do when your company needs a collection to be performed after the collection site closes and whether they would provide mobile or on-site collection site services after hours;
11. What procedures the collection site will use to handle and to notify you of abnormal occurrences, such as dealing with a belligerent donor, employees arriving late, or situations arising at the collection site that appear to be a refusal under the DOT regulations.

These procedures will define how the collection site handles your collections. Communicate your directions and expectations clearly in writing and orally to the collection site. These directions and expectations may need to be reiterated or revisited, as collection site staff changes.

At times, new collection site management unfamiliar with DOT regulations may institute changes that bring the process out of compliance. Normal staff turnover throughout the course of the year is also common, so a good monitoring program will keep up to date with the changes. You can establish, as an expectation, the requirement that the collection site inform you of staff changes that alter the pool of available DOT drug and alcohol test collectors. When they update you, have them also include a statement or documentation that confirms the training requirements were met.

As the person responsible for the drug and alcohol testing program, you should regularly read DOT email updates (subscribe at no charge at: <https://www.transportation.gov/odapc/get-odapc-email-updates>) and federal newsletters, stay current with regulatory changes, and consult with a representative from your DOT Agency <https://www.transportation.gov/odapc/agencies> or ODAPC at: ODAPCWebMail@dot.gov, as needed.

Remember, as the employer, you remain responsible for the actions of the collection site! You can contract out testing functions, but you can never contract away your responsibilities.

At this basic level of oversight, you may choose not to visit the collection site yourself, so it is important to set up and communicate your expectations very specifically.

What are the basics I need to know about the collections?

Once you've established the expectations and communicated them to the collections site, ask how many collectors are trained to perform DOT-regulated drug and alcohol tests. Ask for copies of any proof of training for each collector, Breath Alcohol Technician (BAT) or Saliva Testing Technician (STT) on the staff who might be performing your DOT-regulated drug or alcohol test(s).

The DOT regulation states that a collector must maintain documentation showing that he/she meets all the training requirements. The DOT regulation also requires that the collectors, BATs and STTs, provide this documentation to you by if you request it.

Remember that the DOT does not certify collectors. In addition, we do not recognize any training certificates. We only recognize documentation of the qualification training required under 49 CFR Section 40.33 for urine collectors and under 49 CFR Section 40.213 for BATs and STTs. The documentation must show that the requirements for qualification training have been met and that the individual collector, BAT or STT has successfully demonstrated that he/she is able to properly perform the required DOT mock collections. The collector must also have documented any required requalification training.

If the collection site also performs DOT alcohol tests, ask for the model number of their Alcohol Screening Device (ASD) or Evidential Breath Testing Device (EBT). Compare it to the lists on the following web pages to ensure that it is valid:

Screening devices: <https://www.transportation.gov/odapc/approved-alcohol-screening-devices>

Evidentiary Devices: <https://www.transportation.gov/odapc/approved-evidential-breath-testing-devices>

Make sure that the BATs know how to employ the manual mode and understand that there is an option for using the manual mode on the EBT if an employee cannot provide sufficient breath for the automatic mode.

What do I look for on the testing forms?

General:

Once you have confirmed that you have a collection site with qualified personnel who can perform DOT urine collections and alcohol tests and you have established your basic expectations, you should review copies of the completed testing forms that the collection site provides to you for your company (they are marked "Employer Copy"). The easiest way to review a CCF (for a urine collection) or an ATF (for an alcohol test) is to check each step for completeness and accuracy. Here are the overarching ideas:

- Are the date and time the employee reported for testing listed on the CCF or ATF what you expected them to be? Was there a delay between when you notified the employee of the need to go for the test and the time the employee arrived at the testing site?
- Is the employee identified on the forms the same employee you sent?
- Did the collector and the employee both sign the CCF or ATF as needed?

For alcohol tests:

- Was an alcohol test ordered at all? If so, was it completed? If a drug test was also ordered, was the alcohol test conducted first? (If both tests are required, to the greatest extent practicable, the alcohol test is to be completed before the urine collection process begins.) You can determine this by examining the time printed or written on the ATF versus the time written by the collector in Step 4 of the CCF.
- Note the time on the ATF: either a printout affixed to the form, printed directly onto the form, or written in by hand if the device is not designed to print.
- Are the dates and times accurate?
- What was the final screening test result? (Was the screening test result between 0.00 – 0.019?)
- What was the confirmation test result (if the screening test was 0.02 or greater)?
- If required, was an air-blank performed?
- Is the description, name, or serial number of the device used clearly indicated?

For drug tests:

- Was a drug test ordered at all? If so, was it completed?
- Did the collection site use the correct Federal CCF? (Sometimes collection sites mistakenly use non-Federal forms.)
- Does the CCF contain accurate information in Step 1, Parts A and B?
- Are the appropriate modal boxes checked in Step 1, Part D? For example, if you are a trucking company, the FMCSA box should have been checked.
- Can you read the handwriting of the collector?
- Did the collector press hard enough when writing that the carbon images are clearly visible and legible?
- Check Step 2 to ensure that the temperature was in range and that a split specimen was collected and checked.

- If “Observed” has been indicated, ensure that an explanation is clearly written in the REMARKS section. Unless it is a return-to-duty test or a follow-up test, it is a good business practice for you to confirm by telephone or by immediate email, why the collection was directly observed, making absolutely certain that it was justified, and if it did actually occur.
 - If “Observed” is not indicated, and it was a return-to-duty test or follow-up test, it is a good business practice for you to confirm with the collector and/or employee to verify this. It could be that the box wasn’t checked. However, if it wasn’t collected under direct observation, the employee must have another collection immediately under direct observation.
- Are there carbon shadows visible on the bottom of the CCF? Specifically, shadows indicate that the donor initialed the labels while they were on the CCF and not after the collector applied them to each of the 2 specimen bottles.
- If an employee is unable to provide a specimen, we call it a “shy bladder” situation. After a shy bladder has occurred, was it written up in the Remarks in Step 2? Does your protocol with the collection site require additional documentation to record shy bladders?
- Do the dates in Steps 4 and 5 match? They should.

Complete the Testing Event:

Using your first-hand knowledge of the collection process you gained during your visit, you can compare your expected level of performance with what the testing forms are showing you. When a test has been performed, the testing process is not complete just because your employee left the collection site.

The testing event is still open until you receive:

- (1) your copy of the testing form,
- (2) the test result (if it arrives separately), and
- (3) resolution of any errors from the process

Make notes or keep a log or list of the errors you have found. Communicate the errors directly to the collection site and require written responses acknowledging the errors. Request that the collection site provide you with the steps that they have taken to ensure that the mistakes do not reoccur.

Error Correction Training:

- (1) If the collector or alcohol technician is notified by the employer or service agent that error correction training was required because the collector's or alcohol technician's error caused the test to be cancelled, the collector or alcohol technician must complete the training within thirty days of being notified of the error.
- (2) The collector or alcohol technician must provide documentation that he/she completed the error correction training within 30 days of being notified of the error that caused the test to be cancelled.
- (3) If the collector or alcohol technician did not complete error-correction training within 30 days of being notified that error correction training was required, he/she is not qualified to act as a collector or alcohol technician.

Notify the collection site with any questions you have and/or any errors you found. If you do require corrections that would be correctible flaws under the DOT regulation, ask for and receive the corrections in writing (emails are allowable as documentation for this purpose and provide an excellent correspondence chain record).

For Refusals:

A critical part of running your program is to familiarize yourself with the situations that the DOT rules described as refusals to test and look at the chart entitled "What exactly is a refusal to test and who determines it?" in the DOT Employer's Handbook, "What Employers Need to Know About DOT Drug and Alcohol Testing": https://www.transportation.gov/odapc/employer_handbook

Because the majority of the refusals are only possible during the collection process, you should understand the actions that are considered to be a refusal under the regulations, as these may trigger further action between your company and the employee. In many cases, the decision about whether an employee has refused a test must be made by you on the basis of information provided to you by the collector. In those cases, this decision is not made by the collector.

[This space intentionally left blank]

Level 2 – What if I have some time to visit a collection site, but am not sure what to look for when I am there? – The Basics of Collection Site Visits

Overview

The second level of monitoring begins with the steps mentioned in Level 1, but then adds one or more visits to the collection site. Employers who might want to use this level of monitoring often include those who have gone through an audit or inspection, or those are interested in increasing their involvement with the program. Before visiting the collection site, a good first step would be to view the “10 Steps” video and the mock collection video produced by the DOT at these links:

<https://www.transportation.gov/odapc/collection-site-security-integrity-video>

<https://www.transportation.gov/odapc/dot-mock-collection-instructional-video>

After viewing the video and familiarizing yourself with the collection process, schedule an appointment with your collection site. Be sure to set aside at least one hour for this visit to the collection site. Before your appointment, spend at least five minutes reading the steps of a drug test (listed on the back of Copy 5 of the Federal CCF). The front of the CCF also lists each step instructively in steps one through five. Also, it's a good idea to review the DOT's one-page instruction sheet for the collection process entitled, “DOT's 10 Steps to Collection Site Security and Integrity”: <https://www.transportation.gov/odapc/dot-10-steps-collection-site-security-and-integrity-english>, reprinted here for your convenience:

“DOT's 10 Steps to Collection Site Security and Integrity”

- 1. Pay careful attention to employees throughout the collection process.*
- 2. Ensure that there is no unauthorized access into the collection areas and that undetected access (e.g., through a door not in view) is not possible.*
- 3. Make sure that employees show proper picture ID.*
- 4. Make sure employees empty pockets; remove outer garments (e.g., coveralls, jacket, coat, hat); leave briefcases, purses, and bags behind; and wash their hands.*
- 5. Maintain personal control of the specimen and CCF at all times during the collection.*
- 6. Secure any water sources or otherwise make them unavailable to employees (e.g., turn off water inlet, tape handles to prevent opening faucets, secure tank lids).*
- 7. Ensure that the water in the toilet and tank (if applicable) has bluing (coloring) agent in it. Tape or otherwise secure shut any movable toilet tank top, or put bluing in the tank.*
- 8. Ensure that no soap, disinfectants, cleaning agents, or other possible adulterants are present.*
- 9. Inspect the site to ensure that no foreign or unauthorized substances are present.*
- 10. Secure areas and items (e.g., ledges, trash receptacles, paper towel holders, under-sink areas, ceiling tiles) that appear suitable for concealing contaminants.*

It is a good idea for you to have an agreement with a collection site that will allow you to schedule site visits. When you arrive at the collection site, ask to be given a walk-through of each step in the collection process. The collector or collection site representative should actually take you to each location where the various steps occur. Note the number of people at the facility, both staff and customers. If the waiting area is full and you have to wait for your walk-through, you can assume that your employees will have a similar experience while waiting to take their tests.

After the collector shows you the intake process, which usually includes showing identification or signing an arrival sheet or list, you will likely be shown the area where the collection process will begin. The collector should walk you through each step of the collection process for both an alcohol test and a drug test (if the site does both), explaining each step along the way.

Refer to the Appendix of this brochure for a simplified list of the steps with tips for monitoring how a collection site should carry out the collection procedures.

After your demonstration, you can gauge how well the collector understands the collection process and you may have a better sense of the dynamics at the facility as it relates to customers.

From your office, you should continue to monitor the site's performance. You should still review each testing form as it arrives or is electronically transmitted following a drug or alcohol test. When the form arrives, you should check it for accuracy and completeness, carefully noting that each step has been completed as you would expect and in a way that is consistent with the type of collection that was conducted.

Items to review annually

As the employer, when you monitor the CCFs that are sent to you throughout the year, it is important to remember that you should continue to communicate with the collection site. Ask the collection site manager or representative if new collectors have been hired to perform DOT-regulated tests, or if any collectors have been through requalification training. Collector names are printed on the testing forms, so you can monitor the staff members who are performing these duties and inquire as to the completeness of their training.

When reviewing the collection site for alcohol testing, you should also verify that the collection site is using equipment from the Conforming Products List; regularly performing accuracy checks, calibrating (if qualified), and submitting the equipment for timely manufacturer overhaul; and that their alcohol devices are operated as required by the manufacturer's Quality Assurance Plan (QAP) for the device. After daylight savings time changes, or if you are near a time-zone border, check to see that the internal clock on the alcohol testing device is adjusted appropriately.

Because collection site management and personnel can change over time, it is a good idea to schedule follow-up visits to the collection site. You need to make sure the facility and its staff are continuing to do the job right so that you can ensure that you are compliant with DOT drug and alcohol regulations.

Level 3 – How would I conduct an expanded collection site visit? – Enhanced Collection Site Review

Overview

The top level of collection site monitoring involves a system of both proactive efforts to identify potential problems and reactive measures to fix what has gone wrong. This level of review should include all aspects of Level 1 and Level 2 reviews. As in the lower levels of review, communication with your collection site(s) throughout the year is very important. Remember, collection site staff turnover is common and you want to make sure that each collection site you use is continuing to perform in compliance with the DOT regulations.

Staying Proactive

Your enhanced level of monitoring should still include having the collector walk you through the process but you have other options for taking a closer look. One way is to perform a “mock-collection” where you are the donor, but the collector is demonstrating and you are not actually providing a specimen. The advantages of a mock-collection involve exploring the depth to which the collector has been trained and is familiar with the regulations by asking them the required steps for several different scenarios that fall outside of everyday occurrence.

Different DOT Agencies have checklists their inspectors/auditors use for performing mock collections. You can download many of the DOT Agency checklists from these websites:

The Federal Aviation Administration’s website (<http://www.faa.gov/go/drugabatement>) includes a link to their Drug and Alcohol Compliance and Enforcement Inspector’s Handbook, Order 9120.1, which includes an audit guide for the collection site. It is available at:

<http://www.faa.gov/documentlibrary/media/order/full%209120.1a1.pdf>

The Federal Motor Carrier Safety Administration’s Checklist is found at pages 6-25 to 6-32 of:

https://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/docs/Implementation_Guidelines_for_Alcohol_and_Drug_Regulations.pdf

The Federal Transit Administration’s Checklist is found at:

<https://transit-safety.fta.dot.gov/DrugAndAlcohol/Publications/DocumentInfo.aspx?DocID=783>

The Pipeline and Hazardous Materials Safety Administration Inspection Forms found at:

<https://www.phmsa.dot.gov/pipeline/drug-and-alcohol/drug-and-alcohol-inspection-forms>

In addition to asking the questions on a DOT Agency's checklist, a good monitoring program will determine the protocols for all of the collection scenarios that are listed in the regulation but rarely occur. Review the DOT's mock collection video at: <https://www.transportation.gov/odapc/dot-mock-collection-instructional-video> to refresh your recollection on the following:

- (1) Does the collection site know when and how a directly observed collection is to take place?
- (2) Do they have the personnel available to perform it?
- (3) Do they have a method to ensure that donors are provided with up to 40 ounces of fluid during a shy-bladder waiting period?
- (4) Does the facility monitor the employee during the (up to three hour) waiting period? Will the collection site allow the donor to remain on-site and supervised after normal business hours if an employee requires all or part of their three-hour allotment?

A Level 3 monitoring program allows you to have an on-going relationship with the collection site(s) and the collectors. This generally means that you, as the employer, speaks, meets, or corresponds regularly with the collectors to ensure that they are conducting all DOT urine collections as prescribed in the regulations. At this top level, employers who build and maintain a strong peer network of other managers from different-sized organizations often have much stronger programs.

[This space intentionally left blank]

APPENDIX

Breath Alcohol Testing Steps:

For the screening test:

- The technician verifies the identity of the employee by checking his/her photo identification;
- The technician explains testing procedure and shows the employee the instructions on the back of the ATF;
- The technician completes Step 1 of the ATF;
- The technician instructs the employee to complete Step 2 of the ATF;
- The technician administers the screening test;
- The technician shows the employee the screening result;
- The technician documents the result on the ATF.

If the screening test result is less than 0.02:

- The technician completes Step 3 by dating and signing the certification;
- The technician distributes Copy 1 to the employer, Copy 2 to the employee, and retains Copy 3.

If the screening test result is 0.02 or greater, a confirmation test must be conducted by a BAT:

- The BAT observes a 15 minute waiting period;
- After the waiting period, the BAT is to conduct an air-blank (which must read 0.00);
- • The BAT administers a confirmation test using a new mouthpiece;
- The BAT shows the employee the displayed result;
- The BAT prints the result and attaches it to the ATF;
- The BAT completes Step 3;
- The BAT has the employee complete Step 4 (frequently the employee will choose not to sign);
- The BAT distributes the ATF accordingly.

Note: A confirmation test must be conducted on an EBT that appears on the Conforming Products List (CPL) and prints a result.

APPENDIX (continued)

Urine Collection Steps:

- The collector verifies the identity of the employee by checking his/her photo identification;
- The collector instructs the employee to remove any outer garments (e.g., jacket, coat, hat) and leave their personal belongings such as purses or briefcases in a locked box;
- The collector instructs the employee to empty their pockets and display the contents;
- The employee is given the option to keep their wallet after being inspected;
- The collector explains the basic collection procedure/shows donor instructions on the back of the CCF;
- The collector completes Step 1 of the CCF (parts of this may be pre-printed);
- The collector instructs the donor to wash and dry their hands;
- The collector unwraps a sealed collection container in front of the donor;
- The donor is provided with a single-use plastic container from collection kit;
- The donor remains in the presence of the collector until entering the privacy enclosure to provide the specimen;
- The collector ensures that privacy for urination is secure and a bluing agent is in the toilet.

--The donor then provides a specimen and brings the specimen to the collector--

- The collector observes that the specimen quantity is at least 45mL and checks the split specimen box in Step 2;
- The collector determines the temperature reading and checks off the temperature box in Step 2 within 4 minutes of the collection taking place;
- The collector pours at least 30 mL of urine into the primary specimen bottle and at least 15 mL in the second specimen bottle;
- The collector securely places tamper-evident bottle seals over the bottle caps/lids;
- The collector dates specimen seal bottles only after they are affixed to the specimen bottles;
- The donor initials specimen seal bottles only after they are affixed to the specimen bottles;

APPENDIX (continued)

- The collector folds away Copy 1 of the CCF to reveal Copy 2 (the MRO Copy), with Copies 3, 4, and 5 underneath as well) and instructs the donor to read and complete Step 5 of the CCF;
- The collector reviews Step 5 for completion and accuracy;
- Collector returns to Copy 1 and completes Step 4, (prints and signs his/her name, notes the time and date of the collection and the delivery system transporting the specimen to the lab);

Note: This means that the compliant order of the collection is Step 1, then the actual collection of the specimen, followed by Steps 2, 3, 5, and finally Step 4 (making the required order 1, 2, 3, 5, THEN 4)

- The collector puts the specimen bottles and Copy 1 of CCF in a leak proof plastic bag and seals the bag;
- The collector distributes Copy 5 to the employee and retains the collector copy (Copy 3);
- The collector faxes or otherwise transmits Copy 2 to the MRO and Copy 4 to the DER (you);
- The collector puts the sealed specimen bag in the secure designated area to be picked up by a courier.

[This space intentionally left blank]

What Employers Need To Know About Monitoring Collection Sites *[Guidance and Best Practices]*

Revised August, 2025

**U.S. Department of Transportation
Office of the Secretary**



Office of Drug and Alcohol Policy and Compliance

**1200 New Jersey Avenue, S.E.
Washington, D.C. 20590**

202.366.3784

202.366.3897 fax

www.transportation.gov/odapc

odapcwebmail@dot.gov

Changes from previous version [May 2016]:

- Pages 5, 12, 16, 19: The text “[This space intentionally left blank]” was inserted in areas where there were large sections of blank space
- Pages 6 & 8: Bullet #9 was updated per EO 14168
- Page 9: Removed reference to NHTSA’s Conforming Products List (CPL)
- Page 15: Updated URLs to FTA and PHMSA’s checklists
- Page 20: Room number was removed from the address