



SDPUC Inspection of Drug & Alcohol Collection Sites

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Agenda:

- The Role of the Collection Facilities
- Why This Testing is Important
- Key Compliance Items for Breath Alcohol Test
- Key Compliance Items for Drug Testing
- General Operator Follow-up Items
- Problems Found in Audits
- Questions?

Today's Discussion

- The Role of the Collection Facilities
- Why This Testing is Important
- Key Compliance Items for Breath Alcohol Test
- Key Compliance Items for Drug Testing
- General Operator Follow-up Items
- Problems Found in Audits
- Questions?

The Role of the Collection Facility

- Provide a service for the gas pipeline operator to meet the requirements of 49 CFR 199.
 - Provide a collection site for a DOT drug test.
 - Provide a testing location for a DOT breath alcohol test.
- Ensure their facility meets the requirements of 49 CFR 40

Why is this important?

- The purpose of 49 CFR Part 199 is to help prevent accidents and injuries resulting from the use of alcohol and/or prohibited drugs by employees who work on pipeline facilities.
- 49 CFR Part 40 tells all parties who conduct drug and alcohol tests required by Department of Transportation (DOT) agency regulations how to conduct these tests and what procedures to use.

Why is this important?

- The gas pipeline operator is responsible for meeting the requirements and procedures of drug and alcohol testing in 49 CFR 199.
- The clinic, as an agent for the gas pipeline operator, is required to comply with all provisions of Part 40.

Why is this important?

- Because proper drug and alcohol testing is important to public safety the SDPUC has a been selecting clinics to audit for following correct procedures.
- The SDPUC tells the operator how many clinics we wish to audit.
- Operators that have multiple clinics select clinics they want to inspect based on usage levels and known issues.



BREATH ALCOHOL TESTING

Key Compliance Items for Breath Alcohol Testing

- Does the alcohol testing site comply with applicable physical and security requirements?
 - a. Did the BAT close the door while conducting test to provide adequate privacy?
- Did the BAT explain the basic collection procedure to the employee, including showing the employee the instructions on the back of the ATF form?

Key Compliance Items for Breath Alcohol Testing

- If employee was selected for both an alcohol and drug screen, was the breath alcohol test performed prior to the urine collection?
- Was a confirmation test performed?
 - If yes; Did the BAT tell the employee the reason for the waiting period for a confirmation breath alcohol test?



DRUG TESTING – URINE COLLECTION

Key Compliance Items for Drug Testing

- Are precautions taken to ensure that unadulterated specimens are obtained and correctly identified that meet the following requirements?
 - Were bluing agents in toilet and all water sources secure?
 - How are they secured?
 - Were all cabinets secured?
 - Were all paper towels, excess toilet paper removed?
 - Were you instructed to wash your hands prior to the collection process?

Key Compliance Items for Drug Testing

- Did collector request a photo ID?
- Was the individual asked to remove outer garments, empty pockets?
- Were personnel items secured in lockbox?
- Did the collector ask you to open your wallet/purse to verify there was not a potential adulterant?

Key Compliance Items for Drug Testing

- Did collection site personnel explain the basic collection procedure to the employee, including showing the employee the instructions on the back of the CCF?
- Did the collection room have a suspended ceiling? If yes were they taped/secured?
- Did the collector survey the collection facility before and after you provided the urine specimen?

Key Compliance Items for Drug Testing



- Follow-up Testing
 - Did the collector observe the individual during the collection process?
 - Was the observer the same gender as individual providing the sample?



GENERAL OPERATOR FOLLOW-UP ITEMS

General Operator Follow-up

- Is collector aware of Designated Employer Representative (DER)?
- Is the collection form correctly filled out?
 - Specify Testing Authority? (PHMSA or FMCSA)
 - Reason for Test? Random, Reasonable Suspicion/Cause, Post Accident, Return to Duty, Follow-up
 - Urine Temperature?
 - Split Urine Specimen?
 - Observed Urine Specimen?



PROBLEMS FOUND DURING PAST CLINIC AUDITS

Problems Found During Past Clinic Audits

- At least 18 different sites have been audited in the past three years.

Problems Found During Past Clinic Audits – Drug Testing

- Areas were not secured to prevent tampering or concealing adulterants.
 - Soap dispenser or sharps container not taped off
 - Light panel and removable suspended ceiling tiles accessible .
 - Water not shut off
 - Paper towels, cleaning supplies, extra toilet paper, or waste basket left in room
 - Open overflow holes of the sink and holes on the bottom of the sink
 - Yellow food coloring used instead of bluing agent for toilet
 - Specimen pass through door not secured

Problems Found During Past Clinic Audits – Drug Testing

- Collection area not completely swept for concealed adulterants.
 - Ledges
 - Cabinets – top, inside, edges
 - Light fixtures
 - Air vent
 - Toilet paper and paper towel holder
 - Behind door, sink & toilet
- 9 problems with collection room & area not secured

Problems Found During Past Clinic Audits – Drug Testing

- The collection bathroom is in a common hallway. To ensure security, the collector should accompany and monitor the facility at all times until the specimen has been collected.

Problems Found During Past Clinic Audits – Drug Testing

- 2 problems where the form was not filled out properly
 - Collector did not check on the CCF the drug tests to be performed.
 - Collector checked the FMCSA box instead of the PHMSA box for the DOT agency even though the employee clearly stated he was a pipeline technician.

Problems Found During Past Clinic Audits – Drug Testing

- Collector did not know that the collector's copy of the CCF must be retained for 30 days.
- The collection site does not have a current copy of part 40 and does not have any steps in place to receive updates and keep collectors apprised of the regulatory changes.

Problems Found During Past Clinic Audits – Drug Testing

- Provider records showed different DER than what was in the operator's plan.
- The collector was unaware of the need to proceed with the collection if an employee refuses because the DER is not present. They also do not make the employee try right away if they say they cannot produce urine immediately.

Problems Found During Past Clinic Audits

- 6 Problems found with special procedures
 - Shy bladder – explaining waiting time & amount of fluids to offer over 3 hours.
 - Temperature range – send both samples if one sample is out of range and another is collected with direct observation.
 - If employee won't provide 2nd sample after adulterated sample, 1st specimen thrown away.
 - Steps to take with uncooperative employee
 - Alcohol confirmation test done even if after 30 minutes.

Problems Found During Past Clinic Audits

- 12 problems found related to error correction
 - Time frame for correcting errors
 - Drug test is cancelled due to uncorrected errors
 - Conducting alcohol confirmation test prior to 15 minute wait is fatal flaw.
 - Omission of collector's signature correctable
 - Non DOT form correctable
 - Failure of employee to sign certification statement correctable.
 - Unchecked temperature on form correctable.
 - Collector was not aware of error correction training procedures and that it needed to be completed within 30 days.

Problems Found During Past Clinic Audits

- 37 problems with improper testing procedures.
 - Employee not asked to empty pockets (drug testing)
 - Collector did not ask employee to show the inside of his wallet to check for adulterants.
 - Collector did not know that a urine collection cannot be delayed waiting for an employer or employee representative.
 - Collector did not know that collection could proceed as a direct observed collection if adulterants were found.
 - Steps not done in proper order

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Problems Found During Past Clinic Audits

- Steps not done in proper order
- BAT did not show employee instructions on back of ATF.
- BAT did not know to tell employee the reason for the waiting period for a confirmation test
- EBT calibration not done every 30 days
- Unaware of procedure for two consecutive air blank readings greater than 0 – machine taken out of service.
- Unaware that if the next EBT calibration check produces a result that differs by more than the tolerance in the QAP, that every result of 0.02 or higher since the last calibration check is invalid.
- BAT left door open while conducting test reducing the level of privacy required.

Hopefully you now understand:

- The Role of the Collection Facilities
- Why This Testing is Important
- Key Compliance Items for Breath Alcohol Test
- Key Compliance Items for Drug Testing
- General Operator Follow-up Items
- Problems Found in Audits

Questions?

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