



TECHNICAL NOTICE

SOUTH BEND MEDICAL FOUNDATION

Changes to Department of Transportation Workplace Drug Testing Procedures

The Department of Transportation (DOT) published a final rule effective October 1, 2010, that amends certain provisions of its drug and alcohol testing procedures. Below is a summary of the final rule:

- The DOT drug testing profile will be expanded to include new drug analytes: methylenedioxymethamphetamine (MDMA), commonly known as “ecstasy”; methylenedioxyamphetamine (MDA); and methylenedioxyethylamphetamine (MDEA).
- The initial test cutoff levels for cocaine metabolites will be lowered from 300 ng/mL to 150 ng/mL.
- The initial test cutoff levels for amphetamines will be lowered from 1000 ng/mL to 500 ng/mL.
- The confirmatory cutoff levels for benzoylecgonine will be lowered from 150 ng/mL to 100 ng/mL.
- The confirmatory cutoff levels for amphetamine/methamphetamine will be lowered from 500 ng/mL to 250 ng/mL. **NOTE:** To report a specimen positive for methamphetamine, amphetamine must also be present at a concentration ≥ 100 ng/mL.
- Initial testing of all specimens for 6-Acetylmorphine (6-AM) regardless of morphine concentration is required.
- Reporting of quantitative results for confirmed positive drug/drug metabolites is required.
- The Federal Custody and Control Form (CCF) has been revised; however because of the large number of existing supplies, use of the current CCF is allowed until September 30, 2011. **NOTE:** When the current CCF is used on or after October 1, 2010 through September 30, 2011, collectors and laboratories must:

Collector: Write in the specific DOT Agency (FMCSA, FAA, FRA, FTA, PMSA, or USCG) under which the specimen is collected in the Remarks Section in Step 2 on Copy 1 of the current CCF.

Laboratory: Prior to transmitting a confirmed positive drug test for MDMA, MDA, or MDEA, check “positive” box and write in the specific MDMA, MDA, or MDEA analyte in the “Remarks” section in Step 5-A of Copy 1 along with the respective quantitation.

Although additional drugs will be included in the DOT drug test panel effective October 1, 2010, DOT testing will continue to be a 5-drug test panel. Collectors will continue to check the 5-drug test panel box in Step 1 of the CCF (i.e., the box specified for “THC, COC, PCP, OPI, AMP”).

The revised DOT 5-drug test panel will be grouped as:

1. Marijuana (THC)
2. Cocaine
3. Amphetamine
 - a. Amphetamine
 - b. Methamphetamine
 - c. MDMA
 - d. MDA
 - e. MDEA
4. Opiates
 - a. Codeine
 - b. Morphine
 - c. 6-AM (Heroin metabolite)
5. Phencyclidine (PCP)

Other significant changes to the DOT guidelines include:

- Each Medical Review Officer (MRO) will need to be re-qualified – including passing an examination given by an MRO training organization - every five years. The Final Rule eliminated the requirement for each MRO to take 12 hours of continuing education every three years.
- An MRO will not need to be trained by an HHS-approved MRO training organization as long as the MRO meets DOT’s qualification and requalification training requirements.
- MRO recordkeeping requirements did not change from the five years for non-negatives and one year for negatives.
- The Final Rule does **not** allow the use of HHS-Certified Instrumented Initial Testing Facilities (IITFs) to conduct initial drug testing because the Omnibus Act requires laboratories to be able to perform both initial and confirmation testing but IITFs cannot conduct confirmation testing.

The full text of the final rule can be found at: <http://edocket.access.gpo.gov/2010/pdf/2010-20095.pdf>

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