The Fundamentals of a Random Drug Testing Process

Maintaining a Drug-Free Workplace After Employees Are Hired

011222

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Introduction

Pre-employment drug testing is an effective screening strategy that helps employers avoid hiring candidates who are abusing drugs. But, when it comes to maintaining a drug-free workplace after employees are hired, it does little good.

The cost impact alone of post-hire drug abuse is startling, not to mention the issues surrounding workplace safety, employer liability and employee welfare. Consider these statistics from the U.S. Department of Labor:

• Drug use in the workplace costs employers up to $100 billion annually in lost time, accidents, healthcare and worker's compensation costs.

• Roughly 65 percent of all accidents on the job are directly related to drugs and alcohol.
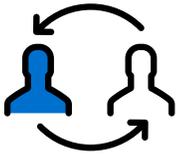
This is where random testing can help. As a powerful tool that helps employers spot workers with substance abuse problems, random testing is used as a long-term, post-hire deterrent for curbing on-the-job substance abuse. It is an integral part of a drug-free workplace that poses a much higher threat of detection than other testing methods such as pre-employment. In fact, random testing is mandated within regulated industries that fall under the U. S. Department of Transportation (DOT) guidelines.

Maintaining a drug-free workplace through random testing also offers a variety of measurable, cost-saving benefits, which include reducing on-the-job accidents and increasing workplace safety, while improving productivity. It also encourages people with substance abuse issues to seek help since all DOT-regulated employers must provide individuals who test positive for drugs or alcohol with a list of qualified substance abuse professionals, regardless of whether the individual is terminated or denied employment.

To help educate organizations about the value of this unique, post-hire drug testing tool, this document explores the fundamentals of a random drug screening process, including key drivers for testing and abuse statistics, a description of the process along with workflow diagrams, estimated drug detection "windows," best practices for random screening and information about updated federal guidelines that mandate random screening.

Key Reasons for Random Drug Testing

In general, the risk tolerance for employee drug abuse is low in most organizations. Below are reasons why organizations implement random testing.

• Drug and alcohol abuse is fairly prevalent.

  - Nearly one in five workers aged 18 to 25 used illicit drugs during the past month.

  - An estimated 8.8 percent of full-time workers reported past month heavy alcohol use.

SOURCE: Worker Substance Use and Workplace Policies and Programs, as published by the U.S. Department of Health and Human Services

• Employees who abuse drugs have higher employee absenteeism and turnover rates.

  - Among full-time workers who reported past month illicit drug use, 12.3 percent reported working for three or more employers in the past year, compared with 5.1 percent of workers without past month drug use.

  - Workers with past month illicit drug use were more likely to report missing two or more workdays in the past month due to illness or injury when compared with workers without current use (16.4 percent vs. 11.0 percent).

SOURCE: Worker Substance Use and Workplace Policies and Programs, as published by the U.S. Department of Health and Human Services Substance Abuse and Mental Health Services Administration Office of Applied Studies

• Employee drug abuse negatively impacts productivity and workplace morale.

  - Workers report being put in danger, being injured or having to work harder to re-do work or to cover for a coworker as a result of a fellow employee's drinking or drug use.

SOURCE: Mangione, T.W., et al. (1998). New Perspectives for Worksite Alcohol Strategies: Results from a Corporate Drinking Study. Boston, MA: JSI Research and Training Institute

• Random drug testing is an effective deterrent.

  - Workers reporting current illicit drug use indicated that they would be less likely to work for employers who conduct pre-hire and random testing than those workers who did not report current illicit drug use.

SOURCE: Worker Substance Use and Workplace Policies and Programs, as published by the U.S. Department of Health and Human Services Substance Abuse and Mental Health Services Administration Office of Applied Studies

What is Random Drug Testing?

Random testing is performed on an unannounced, unpredictable basis on employees whose identifying information such as Social Security number (SSN) or employee number have been placed in a testing pool from which a scientifically arbitrary selection is made. This selection is computer generated to ensure that it is indeed random and that each person in the workforce population has an equal chance of being selected for testing, regardless of whether that person was recently tested or not. Once an individual is selected for testing, the person is notified and must immediately report for a drug test. Since this type of testing has no advance notice, it serves as a deterrent.

Snapshot of Random Testing

The graph below illustrates how workplaces, by major occupational categories, test employees for drug or alcohol use on a random basis. This is among full-time workers aged 18 – 64, 2002- 2004 combined.

SOURCE: Worker Substance Use and Workplace Policies and Programs, as published by the U.S. Department of Health and Human Services Substance Abuse and Mental Health Services Administration Office of Applied Studies
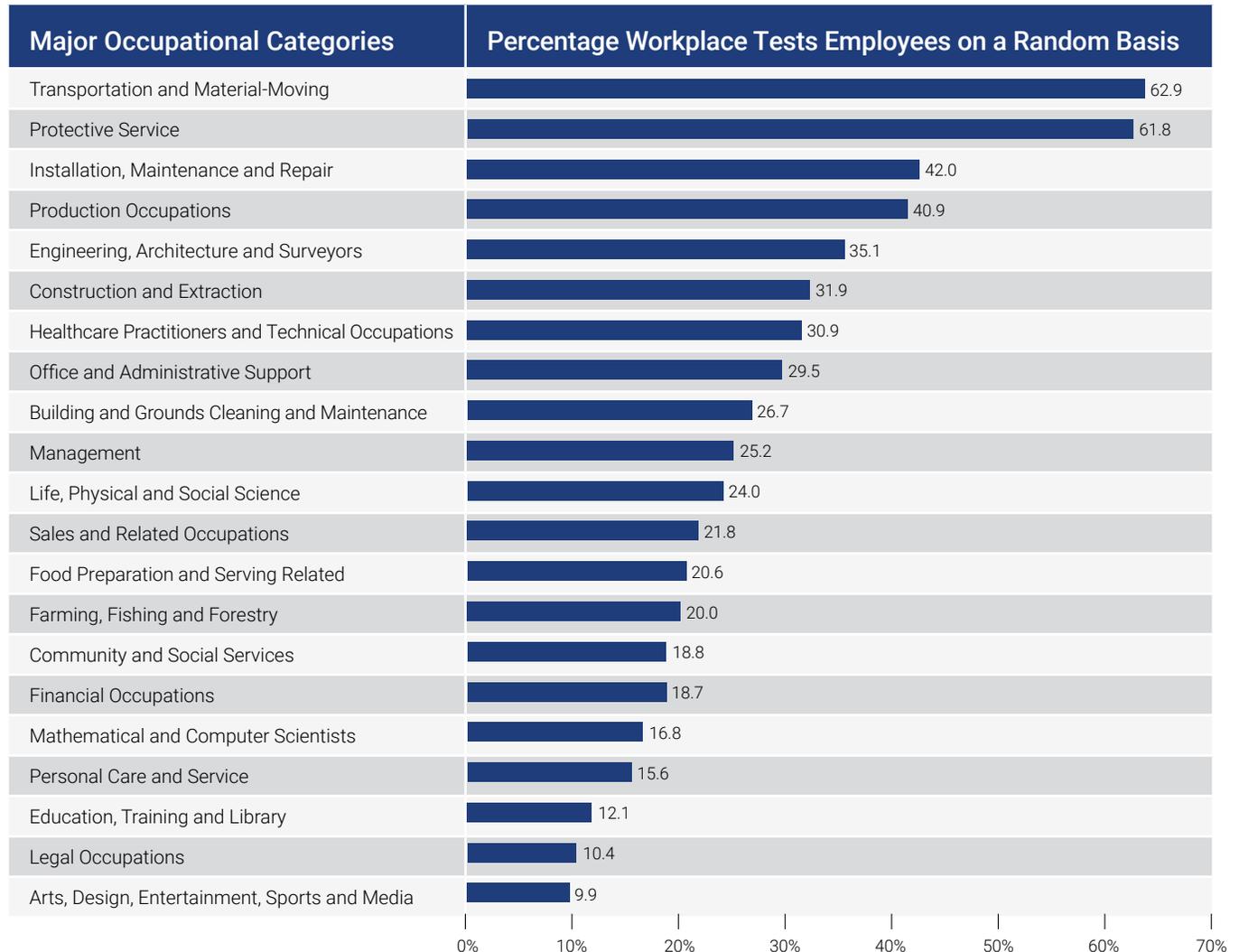
Major Occupational Categories	Percentage Workplace Tests Employees on a Random Basis
Transportation and Material-Moving	62.9
Protective Service	61.8
Installation, Maintenance and Repair	42.0
Production Occupations	40.9
Engineering, Architecture and Surveyors	35.1
Construction and Extraction	31.9
Healthcare Practitioners and Technical Occupations	30.9
Office and Administrative Support	29.5
Building and Grounds Cleaning and Maintenance	26.7
Management	25.2
Life, Physical and Social Science	24.0
Sales and Related Occupations	21.8
Food Preparation and Serving Related	20.6
Farming, Fishing and Forestry	20.0
Community and Social Services	18.8
Financial Occupations	18.7
Mathematical and Computer Scientists	16.8
Personal Care and Service	15.6
Education, Training and Library	12.1
Legal Occupations	10.4
Arts, Design, Entertainment, Sports and Media	9.9

Random notification is a vital aspect of the success of a random program. The detection of any drug is subject to the timing and amount of the drug taken. If allowed too much time between notification and testing, employees who have used illicit drugs may have enough time for their system to clear the drugs. The notification of the individual should not allow enough time to enable the person to clear the drug. The best practice recommendation is to limit the time of notification to 24 hours as this is acceptable to detect most drugs, with the exception of alcohol (ethanol). If ethanol is of concern, the collection should take place within three to four hours.

Understanding "Detection Windows"

Drugs have detection windows, meaning the amount of time after ingestion during which evidence of their use can be detected by a drug test. Depending on an organization's drugs of concern, this directly impacts the organization's allowable random notification timeframe.

For example, alcohol is absorbed and eliminated more quickly than other drugs. As a result, post-accident testing procedures often require testing for alcohol to occur within two to four hours. Other drugs are eliminated from the system at different rates and thus are detectable for different periods of time, often long after the drug's effect has worn off.

Estimated timeframes that drugs remain detectable*

Drug	Estimated Detection Window
Alcohol (1 ounce)	1.5 hours
Amphetamines	48 hours
Barbiturates	2-10 days
Benzodiazepines	2-3 weeks
Cocaine	2-3 days
Heroin Metabolite	Less than 1 day
Morphine	2-3 days
LSD	8 hours
Marijuana (casual use)	3-4 days
Marijuana (chronic use)	Several Weeks
Methamphetamine	2-3 days
Methadone	2-3 days
Phencyclidine (PCP)	1 week

*Urine detection times, except alcohol

Random Testing Frequency

What makes random testing so effective is the element of surprise. While employees know they will be tested, they are never quite sure when, so random selections and testing should be performed at least quarterly. Some employers are selecting and testing more frequently.

Regulated organizations that are concerned about not meeting their annual testing rate requirement should consider increasing their testing. However, to ensure the most effective random program, testing must be spread equally throughout the year

Below are a few guidelines for determining the frequency of random testing.

• Spread testing dates reasonably throughout the year in a non-predictable pattern.

• Conduct random drug tests anytime employees are on duty, or while performing safety-sensitive duties.

• Conduct random alcohol tests just before, during or after the employee performs a safety-sensitive job.

• Each workday or weekend, you can enhance the non-predictability of your program by conducting tests at the start, middle, or end of each shift. The worst thing that could happen is for employees to know, for example, that the second shift is tested on the last Friday of every month, without fail.

Best Practice Tips for a Successful Random Testing Program

• **Ensure your organization has a standard, mandatory drug screening policy in effect for all employees.** Apart from supporting compliance within DOT-regulated industries, this also promotes a fair, consistent process across an entire organization – a critical issue for larger, decentralized businesses with multiple locations.

• **Ensure all drug tests, whether DOT-regulated or not, are reviewed by a licensed Medical Review Officer (MRO).** The medical review process offers donors—typically job candidates and existing employees—the chance to explain any confirmed non-negative results that would otherwise disqualify them from future employment with an organization. Among its many benefits, a standardized medical review process helps ensure the integrity of the drug testing process by:

  - Decreasing legal vulnerability associated with taking adverse employment action for violation of an established drug testing policy.

  - Providing fairness to the donor.

  - Ensuring consistent enforcement of the written drug testing policy.

• Urine, oral fluid lab-based testing and/or instant testing methodologies are best practices for random testing. These tests offer near instant results for negative tests, allowing employees who test negative to quickly return to work after collection with minimal interruption in the work environment and/or productivity.

• Consider using the standard of DOT testing, which involves using a split specimen. This involves dividing a specimen into two bottles. If there is any doubt surrounding the confirmation of a positive result, this process allows the remaining split specimen to be tested at a separate laboratory, independent from the first one.

• If possible, switch to an electronic process for documenting and managing random selections. Select third-party providers offer this option, which allows employers to inactivate random selections and request alternates in one, simple click, instead of documenting, tracking and managing everything manually. This dramatically reduces time spent faxing or e-mailing requests and sifting through manual documentation for DOT audits.

Information about Federally Mandated Random Drug Testing

Random drug testing is required for all federally mandated safety-sensitive employees. Each DOT agency and the United States Coast Guard (USCG) have regulations dictating the specific plans for a random testing program.

Industry	Regulation
Aviation - Federal Aviation Administration (FAA)	14 CFR Part 120, Subpart E, section 120.109(b) 14 CFR Part 120, Subpart F, section 120.217(c)
Motor Carrier - Federal Motor Carrier Safety Administration (FMCSA)	49 CFR Part 382.305
Railroad - Federal Railroad Administration (FRA)	49 CFR Part 219.601 and 219.607
Transit - Federal Transit Administration (FTA)	49 CFR Part 655.45
Pipelines - Pipeline & Hazardous Materials Safety Administration (PHMSA)	49 CFR Part 199.105
Maritime - United States Coast Guard (USCG)	49 CFR Title 46 Part 16.230

Each year, the administrator of each DOT agency authorizes either an increase or decrease to the drug and alcohol testing rates. This decision is based upon the information reported from the Drug and Alcohol Management Information System (MIS) reports required by the DOT. The rates are effective on January 1 of the calendar year. To check for the current rate, visit www.dot.gov/ost/dapc/rates.html.
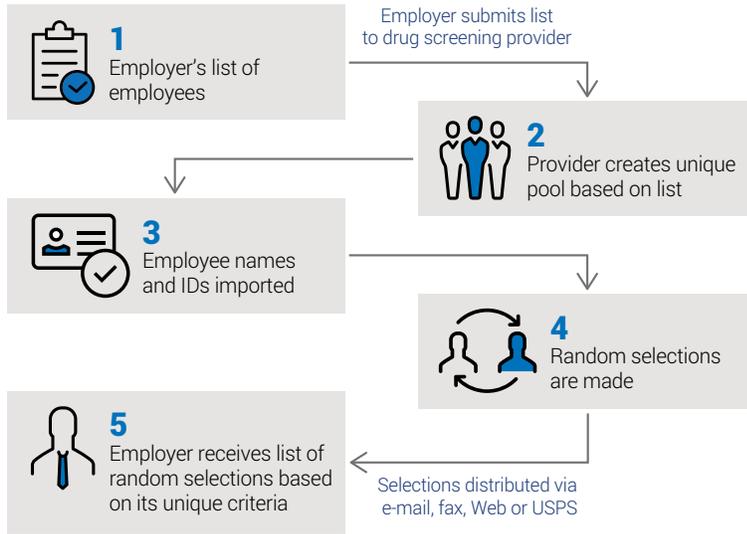
The following chart outlines the annual minimum drug and alcohol random testing rates established within DOT agencies and the USCG for 2018.

DOT Agency	2018 Random Drug Testing Rate	2018 Random Alcohol Testing Rate
Federal Aviation Administration (FAA)	25%	10%
Federal Motor Carrier Safety Administration (FMCSA)	25%	10%
Federal Railroad Administration (FRA)	25% - Covered Service 50% - Maintenance of Way	10% - Covered Service 25% - Maintenance of Way
Federal Transit Administration (FTA)	25%	10%
Pipeline & Hazardous Materials Safety Administration (PHMSA)	50%	N/A
United States Coast Guard (USCG) (now with the U.S. Dept. of Homeland Security)	25%	N/A

Source: www.dot.gov

First Advantage

The Random Process Workflow

The graphic below clearly illustrates a typical random process workflow.

1 Employer's list of employees

Employer submits list to drug screening provider

2 Provider creates unique pool based on list

3 Employee names and IDs imported

4 Random selections are made

5 Employer receives list of random selections based on its unique criteria

Selections distributed via e-mail, fax, Web or USPS

Random Selection Process

1 List should include first and last name, SSN or other unique identifiers; may also include position, location or other key information determined by employer and drug screening provider.

2 Pool details include selection percentage for drug and/or alcohol, frequency, custom or consortium, DOT or non- DOT, random coordinator.

3 Employee names and IDs are imported into random pool based on employer criteria.

4 Selections are made based on criteria established in pool details.

5 Random selections are distributed to employer based on its chosen reporting method: e-mail, fax or Web.

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