



OTA Drug & Alcohol Consortium Information Related to COVID-19

Things are changing every day, but in most cases, trucking demands and regulations are still required. The FMCSA released a guidance until June 30, 2020 furnishing recommended actions for FMCSA-regulated employers in relation to FMCSA's testing requirements. More on this guidance can be found by visiting this link. <https://www.fmcsa.dot.gov/emergency/fmcsa-covid-19-drug-alcohol-testing-guidance>

The OTA's consortium understands the need to balance being a compassionate employer and staying in compliance. We are in this together and are here to work with you to help keep your business in compliance as well as take all necessary steps to ensuring that the well being of your drivers are at the forefront of your mind. It is recommended that you have a conversation with your current TPA regarding the steps below. You as an employer should be working with your TPA to complete the research below before notifying your drivers of random selections. If your TPA is unable to assist with these steps, reach out to the OTA about joining our consortium.

- Educate your drivers on the FMCSA regulations
 - **Random Testing** – You are required by 49 CFR 382.305(k) to ensure that the dates for administering random alcohol and controlled substances tests are spread reasonably throughout the calendar year. DOT guidance further recommends that you perform random selections and tests at least quarterly.
- Address drivers concerns
 - Know your drivers and their concerns. Reach out to them to see if they have any concerns about testing should they be selected for a random.
 - Are they a high-risk individual?
 - Do they have a family member at home who is a high-risk individual?
 - Do they have any concerns about testing if they are pulled for a random?
 - Exposure to COVID – 19 due to wait times
 - Collection site availability
 - Know what you as a DER have the authority to do and still comply with the FMCSA testing regulations.
 - What steps can you take to put your drivers concerns at ease?
 - Wait to notify driver of random selection if they are high risk.
 - Schedule an onsite to have a collector come on location to perform test.
 - Avoiding refusals is the goal however it is the employer responsibility to determine whether the actions of the driver should be considered a refusal.
- Research facilities available for testing before notifying drivers of random selection
 - Operating hours during COVID-19
 - Do they have limited hours of operation?
 - Do they have a certified DOT collector on staff to perform drug/alcohol test?
 - Is an appointment necessary?
 - Urgent care/hospitals vs. drug testing only facilities
 - Are they performing DOT related services?

- Are they performing COVID-19 testing?
- What measures are they taking to practice CDC recommendations during COVID-19?
 - Limiting number of patrons in the facility at a time
 - Practicing social distancing in collection, exam and waiting rooms
 - Disinfecting facilities through out the day to include all common areas, furnish hand sanitizer
 - Not allowing those who show signs of illness into the facilities
- What are the current wait times for testing on average?

If you have any questions, please feel free to reach out to OTA for assistance: info@ortrucking.org, 503.513.0005