

Oral Fluid Drug Testing for Department of Transportation (DOT) Regulated Employees: Approved But Delayed

We are all anxiously awaiting the day when DOT oral fluid testing is fully implemented. However, it seems that the wait will be longer than we all hoped. Although we are past the June 1, 2023, date that allows oral fluid specimens to be used for drug testing of employees regulated by the [Department of Transportation \(DOT\) rules](#), no such testing may be conducted at this time.

The reason is: There must be at least two laboratories certified by the Department of Health and Human Services (HHS), and this has not occurred yet. Under the federal regulations, there must be one laboratory to serve as a primary laboratory and a second lab to serve as a split-specimen testing laboratory.

What else are we waiting for?

In addition, there are currently no oral fluid collection devices approved and available that meet the DOT rule requirements. [Appendix B of the Part 40 Rules](#) requires a single oral fluid collection device that may be subdivided in the donor's presence. Once device(s) are available that meet the Appendix B requirements, the next hurdle is that they must be approved by HHS for use by the specific laboratory that will test the specimen that was gathered by this particular device. Whew!

May I use a forensic oral fluid collection device or another type of container to collect oral fluid specimens for DOT drug tests?

No. Employers and collection sites must wait until all required approvals are in place before conducting oral fluid specimen collections. In the meantime, trained specimen collectors should keep performing urine specimen collections, as prescribed by the federal regulations.

What date *will* I be able to start collecting oral fluid specimens for DOT drug tests?

The short answer is: No one knows at this time. It could be a month, or it could be a year. However, even when the collection devices and labs are approved, you

must complete specific training in oral fluid collections. Note: Urine specimen collectors are *not* qualified to conduct oral fluid specimen collections, nor are you qualified to conduct DOT oral fluid collections if you have been conducting non-DOT oral fluid collections in the past. The rules require entirely new, additional training for anyone wishing to become an Oral Fluid Specimen Collector.

What sort of training must I complete to become a qualified Oral Fluid Specimen Collector?

Oral fluid specimen collectors must successfully complete training as outlined in [Section 40.35](#). Collectors must be thoroughly trained in the regulations and procedures relating to oral fluid specimen collections such as: how to properly complete the Custody and Control Form (CCF), how to conduct collections using your specific collection device(s), how to handle problem collections, and maintaining integrity and privacy. Collectors are also required to know the publication, “DOT Oral Fluid Specimen Collection Procedures Guidelines” (which is not yet available).

After completing the training mentioned above (called Basic Information and Qualification Training), the oral fluid specimen collector student must successfully complete a hands-on training component called the *proficiency demonstration*. The proficiency demonstration requires that the oral fluid collector student conduct a series of specific, error-free mock tests under the observation of a qualified monitor/instructor. Unlike urine collections, oral fluid specimen mock tests must be conducted using the specific oral fluid collection device that the collector will be using in the real world. Therefore, there is no ‘one size fits all’ with oral fluid specimen collector training. If you wish to become qualified on all approved oral fluid collection devices, you will need to complete the *proficiency demonstration* on each and every device.

Certified Training Solutions will be offering online [Oral Fluid Specimen Collector procedures training](#) and device proficiency training by webcam (when approved devices become available).

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[DOT specimen collector training](#) and certification, online [supervisor reasonable suspicion training](#), [drug-free workplace training](#), [screening test technician \(STT\) training](#), and more.

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