

Choosing a Service Agent

Harvey Graves, Ph.D.

Pinnacle Medical Management

<http://www.pinnacledrugtesting.com/>

Choosing a service agent (SA) or a Third Party Administration (TPA) can be a daunting challenge. Most people have little knowledge of the vast array of services that may be needed to provide a comprehensive student drug testing program. The purpose of this paper is to help schools make this decision. The information can be used by most companies, counties, cities and other organizations that are seeking these types of services.

First and foremost, check references, check references, check references. Make sure your potential TPA or SA has specific experience and references in the type of collections you need. There is a huge difference in making a collection on a seventh grade female and a fifty year old male.

The United States Department of Transportation has developed a “List of Excluded Drug and Alcohol Service Agents.” This list is maintained by the Office of Drug and Alcohol Policy and Compliance (ODAPC). This list can be located at <http://www.dot.gov/ost/dapc> ; you may also contact ODAPC directly. This list is called a Public Interest Exclusion (PIE). This list contains names of SA’s, TPA’s, MRO’s, BAT’s, STT’s, Drug Screen Collectors and Laboratories that are not allowed to provide services to federally mandated employees under 49CFR. Although schools are not under any federal guideline a “best practice” would be to follow many of these guidelines.

Remember, during this selection process just because a vendor receives a good reference and they are not on the PIE does not make them a good vendor. The school that is currently using this vendor may not have completed a due diligence as though as this paper outlines. Your reference school may not be aware of the deficiencies of their current vendor. So ask questions.

Collector

Are they certified? Collectors must be certified to do federal testing, also required by some states. Do they maintain proper records for the certification? Are the collectors certified for the type of collections you use (hair, oral fluids, urine, etc.)? How often are they recertified? Recertification is required every two years for federal testing. Do they perform criminal background checks? Make sure your TPA runs criminal background checks on any employee that will have and contact with any student. Unfortunately we live in a time when people seek jobs that give them access to children. Some states (Texas, Missouri) require this procedure.

Random Pool Management

Do they have the ability (hardware and software) to scientifically select participants? Parents often believe that someone at the school is unfairly selecting

their student. This argument can be answered by using state of the art double blinded random number generator software.

Laboratory

Are they, or are they using a certified laboratory? Are they certified by agencies such as CLIA, SAMSHA, American College of Forensic Toxicology, etc? Does the provider send blind samples to the laboratory to check on reliability and accuracy? Do they use a laboratory that can test different modality; hair, oral fluids, urine, etc? Can the laboratory produce quantitative results? This is important for follow-up testing. For instance, a student may produce a positive result for marijuana of 400ng/ml. A follow-up test in two weeks may produce a positive test, but at only 200ng/ml. This would imply that the student is not negative, but in compliance (not using). It may take several weeks for the level of marijuana metabolite to test below the limits of detection. Also, a best practice would be to have a split specimen. The specimen should be split into two containers and sealed by the donor marked as "A" and "B". Bottle "A" would be the primary tested sample. If the parent contested the result they could send bottle "B" to another federally certified laboratory for confirmation. The laboratory should have the capability to perform specimen validity testing, testing for ph, specific gravity, and creatine. These three substances have normal human clinical values. These values can be compared to normal human results. The laboratory should also be able to perform an adulteration panel test. This panel should include the most common adulterants currently in use. Using both the specimen validity and the adulterant panel greatly increase the opportunity to determine if a donor is trying to cheat on the test.

MRO

It is important to have a Medical Review Officer (MRO) that has experience with the type of testing you are performing. The MRO role is to validate the testing results. This involves an interview with the donor (in the case of students it would be the parent or legal guardian). It is important for the MRO to understand the dynamics of interacting with parents as opposed to adult donors. These are issues unique to student testing. Parents often self medicate their children. They will give their children medication that was not prescribed for the particular child. The prescription may be for a parent or another sibling. This practice in the workplace constitutes a positive result. The MRO would be required to report this result as a positive to the employer. The school would want to for a policy for the MRO to follow regarding this practice.

Chain of Custody

Do they use a Forensic Toxicology Chain of Custody (COC)? Similar to the COC used in federally mandated testing. Federally mandated testing requires a five part chain of custody. This COC keeps a written record of names, dates, times, and places. Every person involved in the testing procedure records who they are,

where they did it, and what they did. A chain of custody is very important in preserving the integrity of the testing process. The COC should also be able to process bottle “B” testing.

Record Retention

Do they have the ability to store and retain vital drug testing records? Is this location safe with limited access? It is important that all records pertaining to drug testing are kept in a secure location. Confidentiality is a major concern for all schools. All records of a student's drug test should be destroyed when the student graduates, changes schools, or drops out of the testing program.

Professional Organization

Do they belong to professional organizations such as, DATIA, SAPA, AAMRO, etc.? It is important for the school to determine if the prospective SP belongs to any professional organizations. The information from their organizations will help the school districts keep current with legal issues. This information will also help keep up to date with changing laws, regulations, and trends in the drug testing industry.

Faculty, Parent, and Student Education

The prospective SP/TPA should be able to educate faculty, parents, and students on a variety of matters. Are they available to explain to parents, students, and faculty the drug testing process? The SP/TPA needs to be able to explain the collection process, laboratory procedure, reporting procedure, and any confidentiality issues, what drugs are the schools testing for, how do the parents, students, faculty receive results. Who will know the results, when will they know the results. They will also want to understand the selection process.

Management Information System

Do they have the proper hardware and software to provide useful statistical information? The school will want to know this information. The school needs specific information to ascertain the efficacy of their drug testing program. The SP/TPA should be able to provide information including the number of tests, the number of positive tests, and by the number of positives by substance. The SP/TPA should also be able to provide results by gender, and by grade. This will allow the school to see if they have a problem in a particular grade or gender.

The overall goal of selecting a SP/TPA is to insure you find a provider that fits your specific needs. Keep in mind student testing is unique. Most service providers have specific client bases. Trucking, law enforcement, airlines, railroads, etc. Make sure your provider has experience in managing a student drug testing program.