

Hair Testing in the Transportation Industry

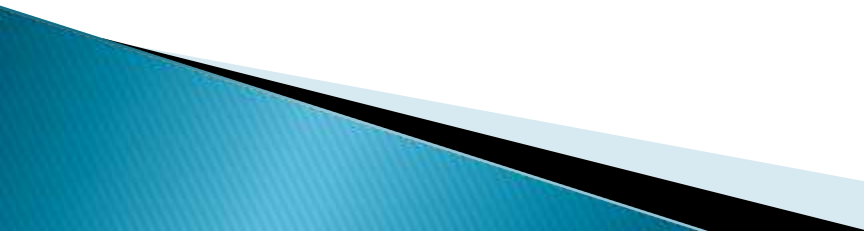
June 9, 2011



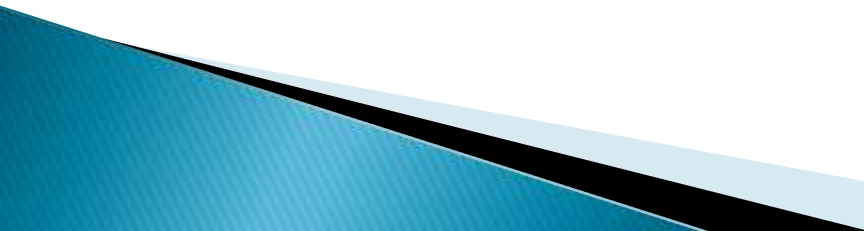
History

- ▶ Hair testing has been around for more than 20 years.
- ▶ We started using them for maintenance facility sweeps in 2005.
 - We had reports of drug use in some shops.
 - With urine, we had to isolate the location to prevent specimen substitution resulting in no work being done for several hours.
 - With hair, substitution is not an issue so they continued to work until their name was called.


History

- ▶ At the end of 2005 and again in early 2006 we had two crashes where three motorists were killed and the drivers were using cocaine.
 - All DOT required tests had been conducted. These drivers were likely substituting their urine samples.
 - A decision was made to begin hair testing and notices were made to all drivers and all support departments of this decision.
 - A program to allow voluntary self-report to obtain assistance in quitting was implemented for existing employees.
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History

- ▶ All employees with direct managerial support of drivers were tested in May 2006 so drivers knew we were committed to this ourselves.
 - ▶ Driver pre-employment and random hair tests were phased in by location from May to August 2006.
 - ▶ After August 2006 hair testing was standard at the time the DOT pre-employment urine sample was collected. Also, all office and shop applicants were tested before hire.
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Testing a Hair Sample

- ▶ Hair is trimmed near the skin using sterile scissors. The follicle is not removed.
 - ▶ It is placed in a sealed specimen container in front of the donor and shipped with a chain of custody to the lab.
 - ▶ The specimen is weighed and trimmed to roughly 1.5 inches at the lab. It is then washed to remove external contaminants.
 - ▶ Like urine, hair testing has a screening test followed by a confirmation test if the screening indicates the presence of a drug.
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Testing a Hair Sample

- ▶ Confirmation testing uses GC/MS/MS or LC/MS/MS testing very similar to urine confirmation and just as accurate.
 - ▶ All results should be reviewed by a Medical Review Officer (MRO) just like urine results to validate that the testing was done properly.
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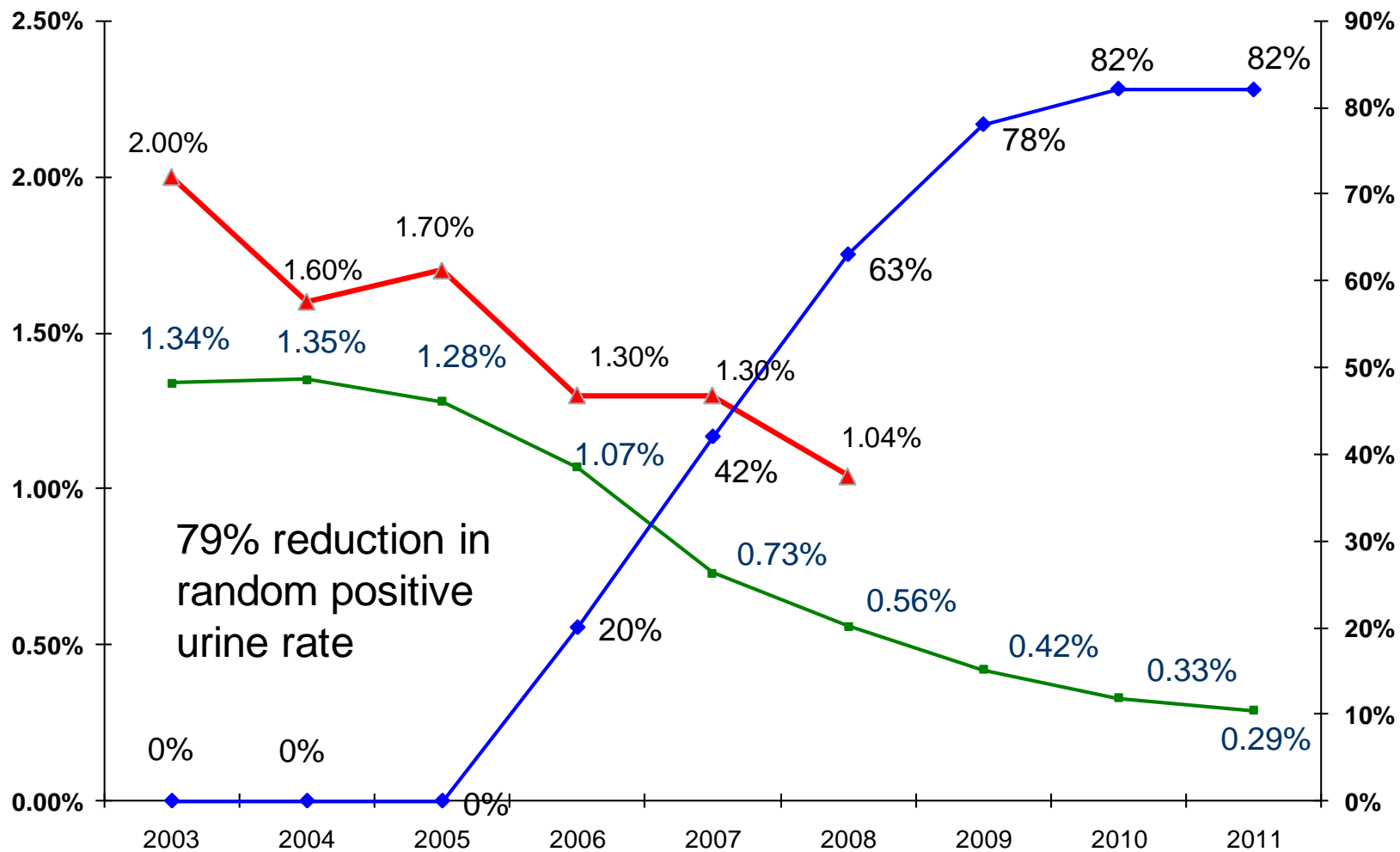
Legislative History

- ▶ SAMHSA convened an expert panel to draft a proposed rule to allow alternative specimens, including hair, for federal workers. They submitted a proposed rule to OMB in 2004 but later withdrew the proposal in 2006. Since then there has been no action to address the issues raised and resubmit the rule.
- ▶ The November 2007 report by the GAO, *Undercover Tests Reveal Significant Vulnerabilities in DOT's Drug Testing Program*, disclosed collection issues that could permit drug users to circumvent detection. Current DOT regulations only permit urine tests for pre-employment and other tests.

Initial Results

- ▶ Pre-employment positives on the hair tests started near 15% and then dropped quickly as word got out to the public that we were hair testing.
 - ▶ Our DOT Random Urine positive rate began to drop rapidly as drug users were removed from the fleet.
 - ▶ Many drivers who passed the DOT test failed the hair test and are likely working elsewhere in the industry.
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Results of Hair Testing



—■— DOT Random Positive Rate —▲— MIS Data —◆— % of Active Drivers Hair Tested

Results of Hair Testing

Analysis of 49,659 Driver Paired Hair and Urine Test Results (May 2006 – March 2011)

| | | |
|--------|-------------------------------|-------|
| 46,429 | Negative on Both Tests | 93.5% |
| 428 | Positive/Refuse on Both Tests | 0.86% |
| 78 | Positive/Refuse on Urine Only | 0.16% |
| 2,724 | Positive/Refuse on Hair Only | 5.49% |

| Positive Hair Only | |
|---------------------------------|-------|
| Cocaine | 1,509 |
| Marijuana | 516 |
| Opiates | 225 |
| Amphetamine | 178 |
| Cocaine, Marijuana | 107 |
| REFUSAL | 72 |
| Cocaine, Opiates | 27 |
| Amphetamine, Cocaine | 21 |
| Amphetamine, Marijuana | 10 |
| Cocaine, Heroin | 10 |
| Marijuana, Opiates | 10 |
| Heroin | 7 |
| Amphetamine, Opiates | 5 |
| MDMA | 5 |
| Opiates, Heroin | 5 |
| Cocaine, Marijuana, Opiates | 4 |
| Cocaine, Opiates, Heroin | 4 |
| Marijuana, PCP | 2 |
| PCP | 2 |
| Amphetamine, Cocaine, Marijuana | 1 |
| Cocaine, MDMA | 1 |
| MDMA, Cocaine, Marijuana | 1 |
| MDMA, Opiates | 1 |
| PCP, Opiates | 1 |

2,724

| Positive Urine Only | |
|---------------------|----|
| Marijuana | 57 |
| Refusal | 8 |
| Amphetamine | 6 |
| Cocaine | 5 |
| Opiates | 2 |

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