

## FTA Drug and Alcohol Program Policy Compliance Checklist

**Agency Name:** [Click here to enter text.](#)

**Date of Review:** [Click here to enter text.](#)

**Date of Policy:** [Click here to enter text.](#)

**DAPM/DER:** [Click here to enter text.](#)

Reference		
	<b>POLICY STATEMENT</b>	
655.12(a)	<i>Does the policy statement include:</i>	
655.12(a)	<ul style="list-style-type: none"> <li>A statement describing your organization's policy on prohibited drug use and alcohol misuse in the workplace?</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
655.15	<ul style="list-style-type: none"> <li>Proof of policy adoption by Local Governing Board or Other Authorized Official?</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
655.15(a)	<ul style="list-style-type: none"> <li>The identity of the person, office, branch, and/or position designated to answer employee questions about your organization's anti-drug use and alcohol misuse programs?</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
655.15(b)	<b>SAFETY SENSITIVE</b>	
	<i>Include the following safety sensitive positions (if applicable):</i>	
	<ul style="list-style-type: none"> <li>Operation of a revenue service vehicle, in or out or revenue service?</li> </ul>	N/A <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Operation of a non-revenue vehicle requiring a CDL</li> </ul>	N/A <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Controlling movement or dispatch of a revenue service vehicle (determined by employer)</li> </ul>	N/A <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Security personnel who carry firearms</li> </ul>	N/A <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Maintenance of a revenue service vehicle</li> </ul>	N/A <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Contractor employees that stand in the shoes of Transit System employees also have to comply</li> </ul>	N/A <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/>
655.15(c)	<b>PROHIBITED BEHAVIOR</b>	
	<i>Include specific behavior and conduct prohibited by the FTA regulations?</i>	
	Prohibit alcohol use: <ul style="list-style-type: none"> <li>4 hours prior <input type="checkbox"/></li> <li>on call, <input type="checkbox"/></li> <li>before, during, and after SS duty <input type="checkbox"/></li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Does the organization prohibit alcohol use 8 hours after accident or until PA test</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Does the policy specify that drug tests can be conducted any time a covered employee is on duty?</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Does the policy specify that alcohol tests can be conducted just before, during, or just after performing safety sensitive duties?</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>

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655.15(d)	<b>PRE-EMPLOYMENT</b>	
	<ul style="list-style-type: none"> <li>A negative test must be received prior to 1<sup>st</sup> safety sensitive duty, must make up if cancelled</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>If employee is not performing safety sensitive duties for 90-days and out of pool need pre-employment test</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Applicant who failed/refused must show evidence of treatment</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
655.15(d)	<b>REASONABLE SUSPICION</b>	
	<ul style="list-style-type: none"> <li>Tests must be conducted by a supervisor trained in making reasonable suspicion determinations?</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
655.15(d)	<b>POST ACCIDENT</b>	
	<ul style="list-style-type: none"> <li>Fatality</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Non-fatal, requiring medical treatment away from the scene, unless the driver can be completely excused from responsibility</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Non-fatal, disabling damage occurs, unless the driver can be completely excused from responsibility</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Drug test must be conducted within 32 hours</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Alcohol test must be conducted within 8 hours</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Alcohol test: if no test after 2 hours, document the reason; no test after 8 hours, update note</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
655.15(d)	<b>RANDOM</b>	
	<ul style="list-style-type: none"> <li>The random selection is scientifically valid.</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Testing is conducted on all days and hours throughout the year</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
655.15(d)	<b>RETURN TO DUTY AND FOLLOW UP</b>	
	<ul style="list-style-type: none"> <li>Are the tests conducted in accordance with Part 40?</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
655.15(e)	<ul style="list-style-type: none"> <li>The procedures that will be used to test for the presence of illegal drugs or alcohol misuse, protect the employee's privacy, protect the integrity of the drug and alcohol testing process, safeguard the validity of the test results, and ensure that the test results are attributed to the correct employee?</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
655.15(f)	<ul style="list-style-type: none"> <li>The requirement that an employee must submit to drug and alcohol testing administered in accordance with FTA regulations?</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
655.15(g)	<b>TEST REFUSAL</b>	
	Include the following as test refusal scenarios:	
	<ul style="list-style-type: none"> <li>Failure to provide breath or urine sample</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Insufficient volume without valid medical explanation</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Tampering, adulterating, or substituting specimen</li> </ul>	Y <input type="checkbox"/> N <input type="checkbox"/>

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	<ul style="list-style-type: none"> <li>Failing to appear for test within a reasonable time</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Leaving the scene of an accident without just cause prior to submitting to a test (may be under post accident)</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Leaving collection facility prior to test completion</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Failing to permit an observed or monitored collection when required</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Failing to take a second test when required</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Failing to undergo a medical examination when required</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Failing to cooperate with any part of the testing process</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Failing to sign Step 2 of alcohol test form</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>MRO verified adulterated/substituted sample</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Once test is underway, failing to remain at site and provide a specimen</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li><b>For pre-employment</b> it is NOT refusal if the employee fails to appear for a test</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li><b>For pre-employment</b> it is NOT refusal if the employee fails to remain at site prior to commencement of test</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li><b>For pre-employment</b> it is NOT refusal if the employee aborts the collection before the test commences</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Include a statement that such a refusal constitutes a violation of your organization's policy?</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
655.15(i)	<b>CONSEQUENCES</b>		
	<ul style="list-style-type: none"> <li>An employee who has a confirmed positive drug test?</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>An employee who has a confirmed alcohol test with an alcohol concentration of 0.04 or greater?</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>An employee who refuses to submit to a drug or alcohol test?</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Do those consequences include the requirement that, in the case of a confirmed positive test or refusal, the employee be removed immediately from the safety-sensitive function and be evaluated by a substance abuse professional?</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>The consequences for a covered employee who is found to have an alcohol concentration of 0.02 or greater but less than 0.04?</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>The consequences for an employee who has:                             <ul style="list-style-type: none"> <li>a dilute negative result <input type="checkbox"/></li> <li>a dilute negative result that is <math>\geq 2</math> mg/dl and <math>\leq 5</math> mg/dl <input type="checkbox"/></li> </ul> </li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>A distinction between what portions of your organization's drug and alcohol testing program are operated under your own authority than those that are required under FTA regulations?</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
655.15(i) RCW 46.25	<ul style="list-style-type: none"> <li>Does the organization employ CDL holders in their public transportation program? If yes,</li> </ul>	N/A <input type="checkbox"/>	Y <input type="checkbox"/> N <input type="checkbox"/>
	<ul style="list-style-type: none"> <li>Does the policy contain a statement that positive tests on CDL holders are reported to the Department of Licensing?</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>
RCW 46.25.123(3)	<ul style="list-style-type: none"> <li>Does their agreement with the MRO and BAT contain the required language?</li> </ul>	Y <input type="checkbox"/>	N <input type="checkbox"/>