



## Drug and Alcohol Audit Services *for Public Transit Systems*



**For more than nine years, ICF Consulting assisted FTA in auditing the drug and alcohol testing programs of transit systems.**

**Some of our service offerings include:**

- Assistance in preparing for an FTA drug and alcohol testing program audit
- Onsite audit of programs, collection sites, and contractors
- Assistance in responding to FTA audit findings and reports
- Drug and alcohol policy review and policy creation
- Implementation of best practices
- Providing technical assistance and answering questions
- DAPM training
- Reviewing forms, procedures, and practices

Federal Transit Administration (FTA) regulations mandate that all transit systems receiving FTA grants (5307, 5309, and 5311) must test safety-sensitive employees for drugs and alcohol. FTA's Office of Safety and Security audits these testing programs for compliance with regulatory standards. Each audit concludes with a final audit report detailing all non-compliance issues. This report is publicly available via the Freedom of Information Act (FOIA) and is therefore accessible to interested parties such as newspapers, public interest groups, and unions. Ensuring compliance with FTA regulations maintains public confidence in the safety of your system, protects against serious liability, and ensures federally-protected worker rights. Over time, all grantee testing programs will be audited, and many will be re-audited.

ICF Consulting evaluates the compliance of drug and alcohol testing programs to help clients identify and resolve deficiencies. Mitigate your systems risk of exposure by gaining an impartial, third-party review of your drug and alcohol testing program.

### Key Questions

- Is your staff knowledgeable about the current FTA drug and alcohol regulations, interpretations, and program updates?
- Have you evaluated your drug and alcohol policy for compliance within the past two years?
- Have you evaluated your collection sites and contractor testing programs in the last year?
- Has your system had any accidents involving operator impairment from alcohol or drugs?
- Does your system have post-accident positive tests and no random positive tests—an indication that your "random" testing program might be predictable?
- Have you received adulterated, substituted, or fatally-flawed drug test specimen results?
- Does your staff have a reliable source of up-to-date information to answer testing program questions quickly and accurately?
- If your system was notified of a pending FTA audit tomorrow, could you produce the necessary materials within 3 weeks?

### Our Capabilities

ICF Consulting has proven experience with the FTA drug and alcohol auditing process. ICF Consulting was the prime contractor of FTA's drug and alcohol auditing program from its inception in 1997 through September 2005. ICF Consulting was instrumental in helping FTA design and implement the program and has led or participated in more than 400 grantee and contractor testing program audits. Our seasoned auditors are fully versed in the FTA audit process and FTA/U.S. Department of Transportation (DOT) drug and alcohol testing regulations (49 CFR Parts 655 and 40). They know how to rapidly identify and efficiently resolve any potential audit deficiencies.

With our in-depth knowledge and field experience, ICF Consulting is uniquely positioned to provide the technical assistance, best practice suggestions, and process improvements necessary to:

- Obtain full regulatory compliance
- Improve detection and deterrence of employee drug and alcohol use
- Reduce program operating costs and liability risks

Whether you need help preparing for an upcoming audit, evaluating your existing testing program, responding to audit findings, re-training your staff, or refining your program, ICF Consulting has the solutions. We can deploy quickly.

# The FTA Auditing Process

An FTA field audit has three components: pre-audit, onsite audit, and post-audit.



**Pre-audit:** Seven weeks prior to an onsite audit, FTA notifies a grantee of the audit. The letter proposes a schedule and requests specific information on the grantee and covered contractors that must be submitted within 3 weeks of receiving the letter. As part of this component, FTA conducts a review of the system drug and alcohol testing policy.

**Onsite audit:** An FTA contractor audit team extensively interviews the testing program staff, including the Drug and Alcohol Program Manager (DAPM), the Medical Review Officer (MRO), the Substance Abuse Professional (SAP), and the Consortium/Third Party Administrator (C/TPA), if applicable. The audit team visits the collection site(s) and conducts mock urine and breath collections. The team also evaluates testing records including chain of custody forms; employee training records; former DOT employer testing records requests; and records regarding pre-employment, random, post-accident, reasonable suspicion, return-to-duty, and follow-up testing.

**Post-audit:** At the completion of the onsite audit, the grantee receives a final audit report identifying each item of non-compliance. The transit system is given 90 days to resolve all items. If any item is not resolved in 90 days, FTA issues subsequent reports with shorter response times. For a re-audit, faster responses are required.

# The Complexities of Managing a Drug and Alcohol Testing Program

ICF Consulting understands the obstacles that transit systems face in managing their programs. For example:

- DAPM turnover is often high, which makes ensuring compliance challenging. Each new DAPM has a lot to learn about the complicated rules.
- Contractor oversight is difficult and time consuming, in terms of both the number of covered contractor testing programs and program components to review.
- Many systems depend heavily on a C/TPA to manage essential program functions, but the ultimate responsibility for compliance remains with the grantee.
- Suburban and rural systems may have staff resource constraints and difficulty identifying compliant collection sites and SAPs.
- State DOT employees often must cover vast distances to assist and audit FTA grant sub-recipients.

ICF Consulting offers a customizable approach that can meet the needs of any transit system or contractor. We can interview your staff, evaluate your testing program management and quality assurance program, and educate your staff on methods to improve compliance and perform self-auditing.

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## About ICF Consulting

ICF Consulting is a leading management, technology, and policy consulting firm. Drawing upon extensive industry knowledge, distinguished professionals, and innovative analytics, the firm develops solutions to complex defense, homeland security, social program, energy, environment, and transportation issues. ICF Consulting's approach to these issues is strengthened by its expertise in information technology, organizational improvement, research and evaluation, program management, and communications. Since 1969, ICF Consulting has been serving major corporations, government at all levels, and multinational institutions. More than 1,500 employees serve these clients in the Americas, Asia, and Europe.

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