

American Medical Review Officers, L.L.C.

www.americanmro.com

7 Compound Drive • Hutchinson, Kansas 67502
(866) 359-0414 • FAX (620) 664-5594

Pipeline Testing Consortium, Inc.

www.pipelinetesting.com

9 Compound Drive • Hutchinson, Kansas 67502
(800) 294-8758 • FAX (620) 669-0906

March 28, 2008

Bohdan Baczara
Office of Drug and Alcohol Policy and Compliance
Office of the Secretary
US Department of Transportation
1200 New Jersey Avenue, SE, Room W2-317
Washington, DC 20590

RE: Renewal of information collection using Alcohol Testing Form and Management Information Systems Form

Dear Mr. Baczara,

Your office is seeking comment on the extension of the Alcohol Testing Form (ATF) and the Management Information Systems (MIS) Data Collection Form for future use. Pipeline Testing Consortium, Inc. (PTC) and American Medical Review Officers, LLC (AMRO), fully support this extension.

PTC has provided drug and alcohol testing services to DOT-regulated pipeline businesses for 17 years; AMRO has performed medical review officer duties for DOT-regulated companies for 5 years. We feel that our combined experience allows us to provide you with some meaningful comments on each of the four areas specified in your notice.

(1) Whether the proposed collections of information are necessary for DOT's proper performance, including whether the information shall have practical utility:

The current versions of the DOT ATF and DOT MIS form have been approved since 2003. The ATF has not been modified since the late 1990s when accommodations were made for use of the ASD. The information it is used to collect is both necessary and complete to document any alcohol test. The MIS was modified in 2003 to simplify and better facilitate the collection of drug and alcohol testing data. The MIS Data Collection Form is necessary and complete to satisfactorily document the testing performed by any transportation employer's drug and alcohol program.

(2) The accuracy of the Department's estimated burden of the proposed information collection:

The burden hours associated with each collection and handling of these forms, as estimated, are accurate with respect to the time it takes for each entity (e.g., BAT, STT, employer) to execute his or her part of the ATF or MIS form.

(c) Ways for the DOT to enhance the quality, utility, and clarity of the collected information:

The ATF has not been modified in several years. It is our opinion that it is time to re-evaluate the form and its current design. The following recommendations reflect our combined experience in using the ATF, as well as comparing it with similar elements of the Federal CCF, for your consideration:

1. Add an Alcohol Form ID Number and Barcode to the ATF (like those used on the Federal CCF). On occasion we, or our employer-clients, have experienced a need to compare copies of the form, or to search for a particular ATF. An ATF Form ID No. and/or barcode would have been very helpful. The numbers printed out by the EBTs are hard to read at times; handwriting and similarity of names makes positive comparison difficult; and any multi-copied form having the same pre-printed number is standard in any industry. Computer scanning and retrieval is commonplace now, but nearly impossible without a barcode. At this time, §40.225(b) seems to limit the addition of an ATF Form ID No. and a barcode by the user, unless the DOT could make an interpretive allowance under §40.225(b)(1).
2. Add a fax number for the DER. Fax numbers are used to send immediate information to the DER. The employer's copy of the ATF follows in the mail. This is modeled after the instructions to collectors (fax and mail) in distributing copies of the Federal CCF.
3. The area on the right-hand side of the ATF is not wide enough to accommodate many of the EBT paper-tape printouts. When taping an EBT printout on the right-hand side of the form, with the edges of the tape right-justified with the ATF, the paper tape covers up part of the information collected in the body of the ATF. This area at present is approximately 1 1/2 inches wide; this width should be doubled for ease of use.
4. The legends in the boxes (e.g., "Affix or Print Screening Results" and "Affix with Tamper Evident Tape") interfere with the printouts of some EBTs that print directly on the ATF. Our recommendation would be to eliminate the boxes all together and then print the legend, in a smaller font, vertically along the right margin.
5. Most of the tamper evident tape used by BATs obliterates any data underneath the tape should the ATF be subsequently faxed or photocopied (e.g., yellow tape is bad; red is worse). Instructions are needed saying that the tape should not be applied over the data areas of the paper tape printouts.
6. The ODAPC address needs to be updated in the Paperwork Reduction Section for both the ATF and the MIS form.

The MIS form was modified in 2003 to greatly simplify the data collection to meet the "ONEDOT" data collection format. This change has been a great benefit to anyone using

the MIS form. We have no further changes to suggest to the design of the form or the data collected. We would, however, like to suggest that DOT make further use of the data collected on the MIS form, by sharing what you discover from transportation employers with the rest of the industry. At this time the MIS form has only one use – to produce a random testing rate for each industry in the following year. Surely the DOT can tell us more than “.8 is the positive random rate for PHMSA.” We recommend a breakdown – company non-specific, of course – of the remaining information gleaned for each mode, on a year-to-year basis (to see trends), using as a minimum the data contained in your automated system which started in 2004. At a minimum, it would be nice to see:

- Number of employers submitting
- Number of employees subject to testing
- Number of tests conducted in all test categories
- Positives by category of test (number, as well as percentages)
- Drug-positive breakdown by drug type

There is so much information that you must have from your MIS data gathering. The data, in fact, would tell a great story about the success of our program! Please share it with us.

(d) Ways that the burden could be minimized without reducing the quality of the collected information on respondents, including the use of automated collection techniques or other forms of information technology:

The changes that are recommended to the ATF in item (c) above would greatly minimize the time that is spent trying to print or tape in areas on the ATF that are physically too small to accommodate industry-EBT output, and a data element that will speed the dissemination of information (fax number).

Thank you for the opportunity for our comments to be considered.

Sincerely,



Mike Neuway
Vice President
Pipeline Testing Consortium, Inc.



David W. Paine, M.D., FAAFP
Medical Review Officer
American Medical Review Officers, LLC