

Competencies of the Medical Review Officer Team Member

Approved February 8, 2007 by the MROCC Board of Directors

The Medical Review Officer (MRO) Team Member serves an important role by enhancing the efficiency and integrity of the drug testing review process, as well as protecting the rights of the donor during the process. This requires that the MRO Team Member understand the role of the MRO, the regulations that impact the MRO, particularly DOT regulations contained in 49 CFR Part 40, specimen collection procedures, chain of custody documentation, and the process of reporting results.

The MRO Team Member must also clearly distinguish between tasks that require the direct involvement of the MRO from those that can be performed by either the MRO or MRO Team Member.

The competent MRO Team Member must be able to:

- Distinguish the roles and responsibilities of the MRO, MRO Team Member, Collector, donor, DER, laboratory, C/TPA, SAP, STE, BAT, DOT and DHHS/SAMHSA in drug and alcohol test ordering, collection, transportation, processing and reporting. The MRO Team Member should recognize the relevant certifications that may be applicable.
- Describe donor rights at the collection site and in the review process.
- Recognize when regulations and guidelines, including those of DOT and HHS, are applicable, and distinguish between requirements and recommendations.
- Describe the reasons for, or circumstances under which, drug tests may be ordered for both DOT and non-DOT donors and be able to distinguish between DOT and non-DOT.
- Recognize which reasons for testing require negative results.
- Describe the steps from specimen acquisition to laboratory reporting, including collection, packaging, transporting, accessioning, transferring to the technician performing the analysis, analysis and reporting.
- Distinguish between a screened, confirmed and verified drug test result.

Collections

- Describe procedures for urine specimen collections, including unwitnessed, witnessed, monitored, split specimen and insufficient quantity collections (including shy bladder procedures).
- Recognize signs the collector should look for regarding specimen adulteration or substitution (e.g. unusual donor behavior, specimen with unusual physical or chemical properties), and take appropriate actions in response.

Custody and Control

- Match chains of documentation to ensure the positive identity of drug test results.
- Review chain of custody documentation.
 - Identify the adequacy of chain of custody documentation.
 - Differentiate between correctable and fatal flaws and take the appropriate actions in response to the flaw.
 - Recognize when the documentation establishes a donor refusal to test.
 - Describe which comments are required, authorized and/or prohibited from notation on the Custody and Control Form.

Laboratory Process

- Describe the circumstances under which screening and confirmation testing are performed, and the differences between the two.
- Describe how drug test results are reported by the laboratory, and specifically which information is transmitted by the laboratory to the MRO Office.
- Examine drug test results from the laboratory
 - Verify the identity of the donor, and be able to link specimen, donor and collection.
 - Of results requiring MRO review, know what elements of that review may be completed by staff and what elements must be completed personally by the MRO.
 - Distinguish those results which can be reviewed by MRO staff from those which require direct MRO review.

- Provide the MRO with the minimum number of negative tests that must be personally reviewed by the MRO.
- Verify the adequacy of the data reported and request additional data when necessary.
- Identify the circumstances which may lead to test cancellation, communicating that assessment to the MRO for review.

Medical Review

- Process the documentation for drug test results that the MRO is not required to review, and those in which MRO Team Member may participate but not complete the review.
- Prepare and organize documentation to facilitate review by the MRO.
- Initiate telephonic contact with the donor.
 - Leave appropriate confidential messages for the donor.
 - Properly identify the donor.
 - Offer the donor an opportunity to speak with the MRO.
 - Address the donor who is hesitant to speak with the MRO.
 - Address the donor who cannot be reached.
- Implement the appropriate procedures when the donor cannot be contacted (describe how many attempts over what period of time; when to contact the employer representative, etc.).
- Assist the MRO with prescription verification or other required interview follow-up procedures.
- Describe how drug and alcohol test results do or do not correlate with impairment.
- Explain screening and confirmation cutoff levels for each of the SAMHSA 5 drugs.
- Explain what levels are relevant in the assessment of pH, creatinine and specific gravity. Explain how specific gravity and creatinine levels affect specimen classification as normal, substituted, dilute (differentiating between dilute specimens based upon specific gravity and creatinine levels).
- Explain the process by which the MRO handles a “shy bladder” situation, including communication with the examining physician and the DER.

Reporting & Outcomes

- Explain the employer's options in response to a "negative dilute" based on the specific gravity and creatinine values.
- Describe how HIPAA and other regulations affect information obtained in the review of a drug test. Describe to whom, and under what circumstances, specific information (including medical information) can be released.
- Prepare documentation for reporting test results, ensuring proper completion, efficient and timely transmission while maintaining donor confidentiality. Describe how negative and positive results may be transmitted.
- Describe the process for ordering a split specimen analysis for "reconfirmation" of a result, and the process for reporting drug test results when a split specimen analysis is ordered.
- Describe the process for handling split specimens that do not reconfirm.
- Describe the circumstances under which a drug test report may be modified.
- Maintain records in accordance with federal record retention requirements.