

U.S. DOT Issues Guidance on Revised Drug Testing Custody and Control Form:

The DOT has issued guidance on the newly revised Federal Drug Testing Custody and Control Form (CCF Form). The CCF Form was revised by the Department of Health and Human Services and is used for the federal employee drug testing program. The U.S. DOT is required by law to use the CCF Form for the DOT drug testing program specimen collection. The guidance clarifies that while the HHS added “oral fluid” specimen collection to the revised CCF Form, only urine specimen collection is authorized under the DOT drug and alcohol testing program. The DOT wants users to know that oral specimen drug testing is not authorized under the DOT drug program although it now appears on the revised form. The revised CCF Form can be viewed [here](#).

How will I know the difference between the old form and the revised form?

- **Copy 1, Step 2:** Added “oral fluid” specimens for drug testing.
- **Copies 1-5, Step 1:** Added “CDL State and No.” to donor identification (FMCSA only);
- **Copies 1-5, Step 1:** Added “Other” (i.e., e-mail) to Collector Contact Info;
- **Copy 1, Step 5a:** Removed analyte names and checkboxes; repositioned results and checkboxes; and added a line for the certifying scientist to record the positive analyte(s) and concentration(s) if a positive result is recorded;
- **Copies 2-5, Step 5:** Added a line for the donor e-mail address;
- **Copy 5:** Removed instructions for completing the CCF from the back of the form. Instructions for completing the CCF are posted on the
- SAMHSA: <https://www.samhsa.gov/workplace/drug-testing> and
- ODAPC: <https://www.transportation.gov/odapc/documents> websites.

When can I begin using the revised CCF Form?

DOT-regulated employers and their service agents (collectors, laboratories, Medical Review Officers (MRO)) are authorized to use the revised CCF Form beginning **September 1, 2020**. To avoid confusion regarding whether oral fluid testing is authorized in the DOT program, and to allow existing supplies of old CCF Forms to be depleted, the DOT recommends as a best practice that laboratories not mail any of the revised CCF Forms to DOT-regulated clients or their service agents until after June 1, 2021 (or until supplies of the old CCF Forms have been depleted).

As a specimen collector, can I still use the old CCF Form after September 1, 2020?

- **Yes.** The old CCF Form may be used until August 30, 2021. When using the old CCF Form between September 1, 2020, and August 30, 2021, a memorandum for the record (MFR) is not required. If you use the old CCF Form after August 30, 2021, you must complete an MFR per 49 CFR § 40.205(b)(2).
- Beginning September 1, 2020, you may *use* the revised CCF Form. However, after August 30, 2021, you are *required* to use the revised CCF Form.
- The DOT recommends that you monitor your existing supply of old CCF Forms and coordinate the delivery of the revised CCF Form with the testing laboratory.

If I use the old CCF between September 1, 2020, and August 30, 2021, do I need to do anything differently?

No. The new information required on the revised CCF Form (i.e., collector and donor e-mail addresses) may be, but is not required to be, included when using the old CCF Form.