

Frequently Asked Questions

FMCSA Clearinghouse

Q: What is happening?

A: The Federal Motor Carrier Safety Administration (FMCSA) Drug and Alcohol Clearinghouse (Clearinghouse) becomes operational on January 6, 2020. The FMCSA is requiring that the commercial driver's license number (CDL) is used instead of the social security number (SSN) or employee identification number (EIN) for the reporting of FMCSA-covered drivers' positive drug or alcohol test results to the Clearinghouse. Consequently, rather than using the driver's SSN or EIN, the CDL should be used for identifying the covered employee/applicant. More information about the [Clearinghouse](#) is available online from the DOT.

Q: I have heard that this regulation is going to be delayed. Is this true?

A: The compliance date for data entry of non-negative test results into the Clearinghouse is not being delayed. However, the FMCSA has proposed an extension of the compliance date for requirement for the state driver's license agencies (SDLAs) to query the Clearinghouse before completing certain commercial driver's license (CDL) transactions. The SDLAs compliance with this requirement, currently due to begin on January 6, 2020, would be delayed until January 6, 2023. This proposal would, however, allow SDLAs the option to voluntarily request Clearinghouse information beginning on January 6, 2020. More information on this potential change is available from the [federal register](#).

Q: Are CDL numbers required for all FMCSA-covered specimens?

A: FMCSA rules require the use of the CDL number on the Federal Custody and Control Form (CCF) effective January 6, 2020. While the lack of the CDL number on the CCF is not considered a 'flaw', it is absolutely required for the reporting of non-negative drug and alcohol test results. Consequently, for non-negative drug test results the MRO must contact the driver, driver's employer, or designated employer representative to obtain it. The MRO will report the verified positive, adulterated, and/or substituted test result in the Clearinghouse.

Q: What does this mean for the laboratory?

A: Very little. While we have been receiving questions from customers and resellers, from a laboratory testing and reporting perspective our current processes, technology, platforms, and documentation are all poised to accommodate the changes related to the Clearinghouse.

Q: What does this mean for collectors?

A: Collectors should follow the guidance in the 'what is happening' paragraph above. For eOrders, it is still incumbent upon the employer to provide the correct donor ID (i.e., State and CDL number). Our collectors will make a reasonable attempt to capture the State and CDL number on the CCF, but the lack of a CDL does not create a flaw at the laboratory.

Q: Will Quest Diagnostics train our drug test collectors?

A: Yes. We will share information and guidance with the collection professionals in both our Patient Service Center and extended Preferred network over the coming months.

Q: Do our technical systems support alphanumeric characters and 25-character fields?

A: Yes. Alphanumeric characters and 25-character fields are supported. The only characters that our systems do not support are special characters (*, #, !, etc.) and Washington State is the only driver's license that contains an asterisk special character. They are no longer issuing licenses with this character and anticipate phasing out current special character licenses by 2024. With the phase out, the limited number of existing licenses, Washington as the only impacted state, and FMCSA drug and alcohol positives as the only impacted specimen type, we anticipate the incidence of this issue to be insignificant and do not plan to modify our systems as a result. In the rare instance where this situation occurs, Quest systems and data entry personnel will ignore or omit the special character.

Q: In what manner should employers or collectors capture the newly required information?

A: If the donor ID is pre-populated on either a paper form or in an eCCF pre-order, employers/collectors should not change it.

- Any user interface in the eCCF systems utilized by Quest Diagnostics that are designed for FMCSA pre-orders or FMCSA collections, **will** prompt for both the CDL number and State of Issuance.
- The MRO should verify the state and CDL number with the donor during the interview process. If the MRO is not able to obtain this information, they will call the employer/TPA.
- The FMCSA views this as an MRO/employer responsibility and neither the lab nor collection site are required to correct or change any pre-populated donor ID.
- For any FMCSA collection utilizing either paper forms or an eCCF system, the collector will attempt to capture and record the required information in Step 1C of the Federal CCF.

While the FMCSA has not shared a rule regarding the order of the state and CDL, they are agreeable with allowing the industry to attempt to reach consensus on a standard format. We will use State followed by CDL number as the donor ID and are encouraging industry peers and providers to do the same.

Foreign countries will represent their CDLs as follows: Canada will use the two-character province as the 'state' and Mexico will use 'MX' as the two-character 'state' prefix.

Q: Is Quest planning to make a change to the CCF or eCCF?

A: No. Any changes to the Federal CCF must be published by the Office of Management and Budget and the current form accommodates the requirements of this change. It represents more of an employer, collector, and MRO process change than a documentation or laboratory procedure change. Our third-party collection software providers may be making updates to their systems to prompt for CDL information for FMCSA-covered collections.

Q: Is Quest planning to make a result reporting change?

A: No. This will not impact how we report results.

Q: Where will the change be represented on the drug/alcohol CCF?

A: On the DOT drug testing CCF, the CDL number and state of issuance should be captured in section 1.C. (in place of Donor SSN or Employee I.D. No.) as pictured below.

C. Donor SSN or Employee I.D. No. _____

D. Specify Testing Authority: HHS NRC Specify DOT Agency: FMCSA FAA FRA FTA PHMSA USCG

E. Reason for Test: Pre-employment Random Reasonable Suspicion/Cause Post Accident Return to Duty Follow-up Other (specify) _____

F. Drug Tests to be Performed: THC, COC, PCP, OPI, AMP THC & COC Only Other (specify) _____

On the DOT alcohol testing form, the CDL number and state of issuance should be captured in section 1.B. (in place of Donor SSN or Employee ID No.) as pictured below.

U.S. Department of Transportation (DOT) Alcohol Testing Form

(The instructions for completing this form are on the back of Copy 3)

STEP 1: TO BE COMPLETED BY ALCOHOL TECHNICIAN

FORM ID: NDAALCH

A: Employee Name _____
(Print) (First, M.I., Last)

B: SSN or Employee ID No. _____