



## ITSA's Safety and Security for Employee Personal Protection Information

ITSA follows the Department of Transportation (DOT) 49 CFR Part 40 regulations for providing information on employee's drug and/or alcohol testing information as the rules govern what we as a consortium third party administrator (c/TPA) and Medical Review Officer (MRO) service can and cannot do in the drug and alcohol testing arena. This includes who and how drug and/or alcohol testing information may be disseminated through the regulations written by the Federal Government.

Additionally, drug and/or alcohol testing is not regulated by HIPAA as HIPAA is a program for insurance companies and actual patient medical results. Please see the link to the document provided by the DOT that explains DOT testing is not regulated by HIPAA. <https://www.transportation.gov/odapc/hipaa-statement>

ITSA has taken measures to ensure the personal protection information of the employees / applicants of our clients meet standards above and beyond the Federal DOT regulations as we committed to ensuring PPI is maintained for the employees and employers we service. One of the measures is that the employer is required to utilize an employee i.d. number unique to what the employer chooses to use. We counsel the employer's that the unique employee i.d. number is one the employer provides and they should never use a full social security number. On occasion if the employer does want to use a portion of the social security number, they will use the last six of the number as that is unique to the employee.

Additionally, the employer provides an authorization form for the employee / applicant to submit for testing to a collection facility. That unique employee i.d. is the identifier of the employee. On a DOT Custody and Control Form (CCF), the collector at the collection facility is required to use the employee i.d. number on the authorization form provided. Only the employee i.d. number is provided on Copy 1 of the CCF that goes with the specimen provided by the employee / applicant. There is no other identifying information that the laboratory has for identification. The laboratory uses their accessioning procedures per 49 CFR Part 40 in identifying the specimen i.d. that is on the specimen bottles A and B matches what is on the corresponding specimen i.d. number on Copy 1 of the CCF.

Once the laboratory completes the analysis of the sample, the result is provided to ITSA's MRO through a secure FTP download. From there the MRO has been provided a copy of Copy 1 signed by with the certifying scientist who confirmed the result and compares it to the MRO Copy 2 to ensure the specimen i.d. numbers on the result and the MRO Copy 2 match. If the result is negative, the result is reported through the ITSA web portal the employer as noted in the next paragraph.

Each company contact the client has determined as the Designated Employer Representative (DER) to receive drug and/or alcohol results from the Medical Review Officer, has a unique username and password to log into the secure system to retrieve the employee or applicant drug and alcohol testing results. There is a 2-step verification process that ensures the person logging into the ITSA web portal has the required credentials.

Using the web portal is the secure process for locating the test result(s) the DER needs in order to fulfill the requirements of compliance with the 49 CFR Part 40 regulations.

Please note if the MRO needs to have a confidential interview with the employee, the MRO will ask the employee identifying information found on the CCF to verify the employee who the MRO is speaking is the actual employee whose test is required the interview. Per 49 CFR Part 40 regulations, this is not a Doctor / Patient relationship.

*The Most Important Part of Your Substance Abuse Testing Program... Integrity*