

## **Urine Collection Complications and Solutions**

### **Donor fails to remain at testing site until the testing process is complete.**

- Provided that the test is not for pre-employment, this is considered a refusal.
- For more info see § 40.191 (a)(2)

### **Donor does not want to sign form and/or initial specimen vials.**

- Do not argue with donor, simply acknowledge and write in the CCF remarks “Donor refused to sign CCF” and /or “Donor refused to initial specimen vials”.
- Process and send specimen as normal.
- For more info see § 40.73 (a)(1)

### **Donor is unable to provide adequate specimen amount.**

- Initiate “Shy Bladder” protocol.
- If there was a specimen at all, discard it (unless it was out of temperature range, or showed evidence of adulteration or tampering § 40.65(b) and (c) in which case see situation discussed below).
- Write in remarks the time of the first try and when the three hour period ends, and note the time of each subsequent attempt made by the donor there (or in a shy bladder log).
- Advise donor to begin drinking water and that they have 3 hours (from the time of first collection) to produce a specimen for testing. § 40.193 (2)
- If donor refuses to drink water, that in itself is NOT a refusal.
- If the donor refuses to make the attempt to provide a new urine sample, or leaves the collection site before the collection process is complete, note the fact in the “Remarks” line of the CCF and notify the DER. This is a refusal to test. § 40.193 (3)
- If the donor is unable to provide a specimen of appropriate quantity within the 3 hour allotted time period you must discontinue the collection, note the fact on the “Remarks” line, and **immediately** notify the DER. § 40.193 (4) This is an incomplete test.

### **Temperature of specimen is out of range.**

- You will need to advise the donor that a second, observed collection is now required, since the first specimen was Temperature Out of Range. (See § 40.65 (5))
- Before beginning the second, observed collection, you must first complete the CCF for the Temp. out of Range specimen. This means, decanting, splitting (if there is enough to split, if there is only enough for one vial then DO decant into only one and still send the one vial), put on labels, have donor sign etc. as per normal protocol. (See § 40.65 (6))
- If the donor agrees to the second, observed collection, begin filling out the new CCF before completing the packaging of the first specimen; this is so that you can cross-reference the two CCFs, writing in the remarks of the first one, “2nd observed collection Spec.ID #####” and on the second collection in the remarks write “1st collection Temp. Out of Range Spec. ID #####”
- After writing in the cross-reference information on the first CCF you should complete the packaging of the first sample (so as not to confuse the specimens once you have completed the second collection).
- If the donor is unable to provide a second specimen right away, initiate “Shy Bladder” protocol as per normal; write start time and end time in remarks, advise donor there are three hours to produce specimen etc. (as per above)
- If the donor does NOT agree to the second, observed collection, this is a refusal to test and the the initial specimen is to be discarded, DER to be called. \*Only send first sample if there is a second, observed sample, if no second sample DO NOT send first sample\*

### **Temperature is out of range AND there is insufficient quantity.**

- Temperature out of Range protocol should always be followed, even when there is an insufficient quantity. That means following the protocols as laid out above (for a TOR specimen) with the insufficient quantity specimen being decanted into only one vial, label affixed, dated, signed and CCF filled out. (See § 40.65 (6))
- An observed collection will need to take place for the second collection (as per TOR protocol) and you will need to cross-reference the CCFs (as per protocols laid out above for TOR).

### **Labels tear as you are trying to place on vials.**

- If you accidentally tear the seal as you are putting a label onto the vial (or it tears before being placed into the packaging) you must get a new, second CCF and fill it out with the information from the collection, and have it become the CCF for that collection.
- You then use the seals from the second CCF (which now is the CCF being used) place the seals perpendicular to the initial seals so it is evident what that there is a second set overtop the the first set.

### **Donor attempts adulteration.**

- If it becomes apparent to you (upon your inspection of the specimen § 40.65 (c)) that the donor has attempted to adulterate the specimen, you must immediately conduct a new collection using direct observation procedures. (See § 40.67)
- In the case where a specimen is collected under direct observation because of showing signs of tampering, you must process both the original specimen AND the specimen collected under direct observation; even if the first specimen is Quantity Insufficient. (See § 40.65 (c)(2))

### **Donor refuses to provide specimen.**

- The employee has refused a drug test if they do any of the following during the collection procedure:
  - Fail to appear for the test.
  - Fail to remain at the testing site until the testing process is complete.
  - Fail to provide sufficient amount of urine when directed, and it is determined by medical evaluation, that there was no adequate medical explanation for the failure. (See § 40.193(d)(2))
  - For a directly observed collection, fail to permit the observation or monitoring (including failure to follow observers instructions or raise your clothing above the waist, lower clothing and underpants and turn around to permit the observer to determine if you have any type of prosthetic or other device that could be used to interfere with the collection process).
  - Fail to cooperate with any part of the testing process (e.g., refuse to empty pockets when so directed, behave in a confrontational way that disrupts the collection process, fail to wash hands after being directed to do so.)

- Admit to the collector or MRO that you adulterated or substituted the specimen.
- As the collector you must note the refusal in the “Remarks” section (Step 2) and sign and date the CCF. Do not argue with the donor, you do NOT have to try and convince them to take the test, simply advise them that whatever has happened (as per above list) is considered a refusal to test and fill out the “Remarks” section with the information about what has occurred.

**Donor has no ID.**

- The donor is required to provide photo ID, issued by the employer or a federal, state or local government. You may not accept faxes or photocopies of identification.
- Positive identification by an employer representative is also acceptable.
- If the employee can NOT produce positive identification, you must contact the DER to verify the identity of the employee. (See § 40.61 (c))

**CCF numbers do not match on specimen vial labels and CCF.**

- You must use a new CCF if the labels do not match the Specimen ID as it appears
- on the CC