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The Role of The Medical Review Officer in Drug Testing

The Medical Review Officer (MRO) plays an essential role in workplace drug testing programs. In fact, the MRO is a required element of federally mandated drug testing programs, such as the Department of Transportation (DOT), and is highly recommended for private “non-regulated” or “non-DOT” programs as well. Since the MRO provides an important safeguard in the testing process, many states, but not currently Indiana, do require MRO review of non-regulated drug tests.

The MRO, as defined by federal regulations (49 CFR 40.121) is “a licensed physician that has additional qualification training for interpretation of drug test results, as well as collection issues, record keeping, chain of custody, and reporting of results.” There are currently only two organizations that can grant federal MRO certification.

The primary role that the MRO plays is reviewing non-negative drug tests, such as positive, substituted and adulterated tests. The **positive test**, as the name implies, has identified the presence of a drug or specific drug metabolite in the donor’s urine. The role of the MRO in this scenario is to interview the donor and determine if there is a legitimate medical explanation for the positive result, such as a legal prescription or recent medical procedure where the drug was administered. If either of these sources can be properly documented, it is considered legal usage and will not result in a positive report to the employer. Unfortunately for some donors, the claim of being exposed to second-hand marijuana smoke (or some other type of passive exposure) is not considered a legitimate medical explanation and a positive report will go to the employer.

The **substituted test** involves a specimen that has been given and is not consistent with human urine. There are metabolic breakdown products that are found in specific concentration ranges in human urine. If these breakdown products are not present, or are found in abnormal concentrations, the sample is considered substituted, or not consistent with human urine. The MRO will interview the donor and the substituted test result will be reported to the employer.

The **adulterated test** involves a specimen that has been tampered with (by the donor) in order to obscure the ability of the analytical testing process to identify a specific drug. However, the laboratories are able to run tests that can identify the adulterant that is added to the urine. The MRO will interview the donor as part of the process and then the adulterated test result will be reported to the employer.

For answers to questions or for more information regarding the implementation or review of a drug testing program, please contact Dan Todd at d.todd@lph.org or 219-851-3827.