



# CHAIN OF CUSTODY: IT'S A STATE OF MIND

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## LEARNING OBJECTIVES

- 1.) Identify resources available to ensure adherence to chain of custody procedures and develop training protocols.
- 2.) Review PRH and other guidance regarding urine toxicology screening collection process.
- 3.) Learn 3 core elements to maintaining chain of custody procedures.
- 4.) Define the difference between observed and supervised urine collections.

# FOUNDATIONAL CONCEPTS

10 Panel urine drug tests using nationally contracted laboratory (LC/CDD) to conduct initial screening (immunoassay) and, if positive, then confirmed with mass spectrometry

- Amphetamines (including methamphetamines)
- Barbiturates
- Benzodiazepines
- Cannabinoids /THC)
- Cocaine (Benzoylecgonine)
- Opiates (Codeine, Morphine)
- 6-AM (Heroin metabolite)\*
- Phencyclidine (PCP);
- Fentanyl
- Hydrocodone/Hydromorphone (Vicodin)
- Oxycodone/Oxymorphone (Percocet, OxyContin)

# DEFINE CHAIN OF CUSTODY

From the TEAP Desk Reference Guide (DRG):

For drug testing, chain of custody refers to the management and storage of a specimen from the moment the specimen is provided until the final destination of the specimen, and the review and reporting of the final result.

Centers must develop a way to document the collection process and adherence to chain of custody.

Therefore - CoC is a **systematic set of procedures and controls** that track and document the management and storage of the urine drug screens.

## WHY DEVELOP AND TRAIN ON CHAIN OF CUSTODY PROCEDURES?

Ensures the integrity of the urine sample so that there are accurate test results

These are high stakes drug tests with significant consequences to our students, such as loss of training opportunities.

Allows for a standardized collection process across students

Reduces the likelihood of tampering or tampering attempts



AVAILABLE  
GUIDANCE



# IN GENERAL

General guidance applicable to workplace drug testing

- Federal Register (Vol. 88, No. 196 / Thursday, October 12, 2023) issued Rules and Regulations for Workplace Drug Testing Programs  
(<https://www.govinfo.gov/content/pkg/FR-2023-10-12/pdf/2023-21734.pdf>)
- Urine Specimen Collection Guidelines United States Department of Transportation  
Revised January 2018  
(<https://www.transportation.gov/sites/dot.gov/files/docs/resources/partners/drug-and-alcohol-testing/2567/urine-specimen-collection-guidelines-january-2018.pdf>)



JOB CORPS SPECIFIC





# Policy and Requirements Handbook

SPECIFICALLY, IN THE TEAP SECTION 2.3  
R5

## FIRST: THE PRH: 2.3, R5 G, I, (D)

Collection of urine for drug testing shall be in accord with chain-of-custody principles and conducted by health and wellness staff or a staff member trained in urine collection procedures.

This is the only reference to CoC in the PRH.

*Job Corps Health and Wellness Program*

## DESK REFERENCE GUIDE

Trainee Employee Assistance Program Specialist



UPDATED IN  
DECEMBER 2024  
AND EXPANDS ON  
PRH



# Home

## Health & Wellness: Home

Job Corps Policy and Requirements Handbook

COVID-19

Wellness Staff Desk Reference Guides

Health & Wellness Director

Center Physician

Center Mental Health Consultant

Mental Health Resource Bundles

Center Dentist

TEAP Specialist

Applicant File Review



**Welcome to the Job Corps Health and Wellness Program Website.** This site is designed for Job Corps health and wellness staff — use it to connect with your peers, get the latest information on new initiatives and training events, learn about the health program, and link to related resources.

## New Items

- [TEAP Intervention Plan Template](#)  
— March 2024
- [ETA 6-53 Job Corps Health Questionnaire and ETA 6-53 Guide for OA](#)  
— March 2024
- [PI 23-09 Managing Respiratory Viruses on Job](#)



DRUG TESTING  
REQUIREMENTS  
AND  
RECOMMENDATIONS



# BREAKING DOWN THE PRH

PRH says:

Urine drug testing “conducted by health and wellness staff or a staff member trained in urine collection procedures.” and “In accord with chain-of-custody principles”

Expansion:

- Someone with organization knowledge who understands CoC then trains staff (ideally HWC staff)
- Establish and document the “chain of custody principles”
- FAQ: Can someone outside of wellness collect the urine samples?  
Answer: It depends on training, storage, documentation and center process

# GENERAL OVERALL STEPS

The chain of custody documentation process provides for:

- Clear and unique **identification** of the individual being tested
- Clear and unique **labeling** of the specimen
- Identification of all persons who handle the specimen — legible signature required.
- A historical **record of events**, with action dates clearly stated
- **Security** of the specimen using a sealed, tamper-evident process

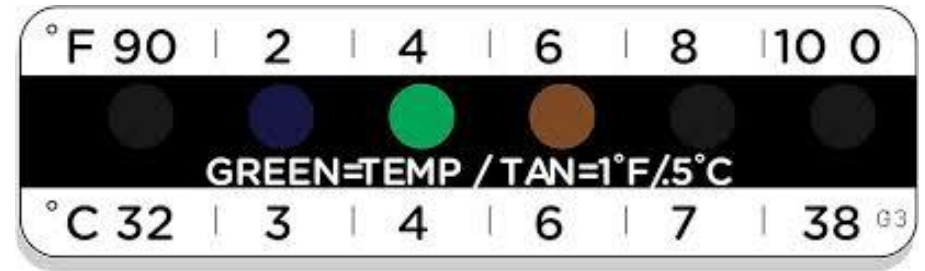


# DECREASE LIKELIHOOD OF ADULTERATION: CONTROL THE ENVIRONMENT

- Trained in urine collection procedures and chain of custody
- Provide private area for specimen collection
- Perform only one collection at a time
- Secure the area from hidden contaminants
  - Remove all cleaning products from the collection room area
  - Place a blue chemical in the toilet tank to color the water
- Turn off additional water sources in the immediate collection area, if possible
- Have the student wash (with water only) hands and clean under nails and give student a paper towel for hand drying **before** they provide their sample

## DECREASE LIKELIHOOD OF ADULTERATION: INDIVIDUALS

- Remove outer garments (e.g., coats, sweaters, jackets)
- Prohibit bags/packages/purses in collection area
- If urine collection part of a medical exam, then collect sample while in gown
- Collection personnel stands close to the door and be aware of unusual sounds
- Have student hand the specimen directly and immediately to collection personnel
- Then...

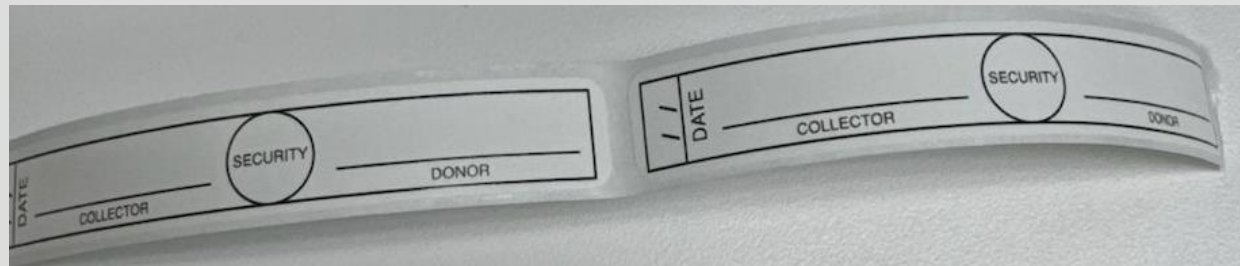


NUMBER ONE WAY TO DETECT  
ADULTERATION



## NEXT STEPS

- Perform visual and temperature checks
  - Visually – does the sample appear free of possible contaminants?
  - Temperature should fall between 90.5 F and 99 F
- Very difficult to maintain temperature range once leaves body
- Document process – especially if concerns regarding the integrity of the process and methodology.
  - From CDD – use security strips:



# SECURITY STRIPS

**Make sure the security tape is legible and fully completed (otherwise is fatal error).**

- LEGIBLY complete the Chain of Custody Security Tape.
- After drawing the urine from the cup into the tube; place the completed chain of custody security tape over the top of the tube, making sure the security circle is over the top center of the tube.

The following should be completed in full:

- Legible signature of person collecting the urine sample and legible student signature
- Date urine sample was collected

# LABELS TO ASSIST WITH DOCUMENTATION

Chain of Custody has been implemented and followed

- Date of Collection:
- Prescription medications taken last two weeks:
- Temperature of Sample:
- Student Initials (indicates sample has not been altered):
- TEAP Specialist/Designee Signature:

## WHAT TO DO IF ADULTERATION DETECTED?

- PRH does not specifically address adulteration attempts.
- PRH addresses **refusal** but if provide a urine sample then did not refuse (see PRH 2.3 R5 g 1(c): (If a student refuses to provide a specimen or has an unexcused absence from his or her follow-up drug test, he or she shall be presumed guilty of the Level I infraction Drugs: Use of drugs as evidenced by a positive drug test.)
- PRH addresses if cannot produce a sample: (Students who state they are unable to produce a specimen must be referred to the Center Physician or designee for follow up.)

# ADULTERATION ATTEMPTS

## Guidance:

- Explain, document and recollect.
- Change your method
- Implement an **observed** collection method rather than the default of supervised collection



## SUPERVISED VERSUS OBSERVED COLLECTION



Observed collection is defined as: Watching the urine stream leave the body and enter the specimen container



Observed only recommended for concerns about adulteration as it is intrusive and staff time-intensive



Have clear and consistently implemented SOP about supervised versus observed urine collection as this ensures standardization of collection process (part of CoC)



## CHAIN OF CUSTODY FOR ALCOHOL TESTING PROCEDURES

- Students who are suspected of being under the influence of alcohol are immediately tested
- Use Lifeloc Breathalyzer (see PI 22-02) or another **professional** breathalyzer that measures BAC
- Administered by trained staff member (TEAP responsible for ensuring training occurs)
- Here is where CoC applies



## PI 22-02 LIFE LOC BREATHALYZER UTILIZATION

- Required use
- Requires Annual Calibration (at minimum)
- Must have a way of determine blood alcohol concentration if Life Loc unavailable/not used

# ALCOHOL TESTING CHAIN OF CUSTODY

- Trained in collection procedures and chain of custody
- This training based on centers SOPs and manufacturer-supplied materials
- Provide private area for administration
- Perform only one collection at a time
- No eating/drinking for 15 minutes
- Document (even negative results) with proper labeling and then send to HWC
- Then filed in SHR

## xx JOB CORPS CENTER TEAP/TUPP REFERRAL FORM

Check all that apply:     TEAP/TUPP Referral         Suspicion Testing     Breathalyzer

<b>Student Name:</b>		<b>DOB:</b>		<b>Date of Referral:</b>	
<b>Student ID#:</b>		<b>Referred by:</b>			

**◆TEAP/TUPP REFERRAL BECAUSE:**

<input type="checkbox"/> Student wants to self-refer to TEAP/TUPP	<input type="checkbox"/> Talk of relapsing	<input type="checkbox"/> Seen in high-risk places (bar/liquor store)
<input type="checkbox"/> Other students expressed concerns	<input type="checkbox"/> Interacting with known users	<input type="checkbox"/> To cease using nicotine/tobacco/vaping

**◆REFERRAL FOR SUSPICION TESTING BECAUSE OF MULTIPLE AND NOTABLE SIGNS OF USE:**

**Recent use of Alcohol/Drugs as Evidenced by (Check all that apply):**

<input type="checkbox"/> Aggressive behavior	<input type="checkbox"/> Slurred speech	<input type="checkbox"/> Poor coordination	<input type="checkbox"/> Staggering
<input type="checkbox"/> Drowsiness/nodding off repeatedly	<input type="checkbox"/> Non-responsive sleepiness	<input type="checkbox"/> Odors of Substances	<input type="checkbox"/> Bloody nose
<input type="checkbox"/> Changes in personality	<input type="checkbox"/> Loss of motivation	<input type="checkbox"/> Nausea/vomiting	<input type="checkbox"/> Increased irritability
<input type="checkbox"/> Dry mouth/dehydration	<input type="checkbox"/> Poor judgment	<input type="checkbox"/> Possess paraphernalia	<input type="checkbox"/> Dilated or pinpoint pupils
<input type="checkbox"/> Change in behaviors/increase impulsivity	<input type="checkbox"/> Rapid mood changes	<input type="checkbox"/> Bloodshot eyes	<input type="checkbox"/> Excessive scratching
<input type="checkbox"/> Confusion/disorganized thinking	<input type="checkbox"/> Changes in breathing	<input type="checkbox"/> Flushed face/skin	<input type="checkbox"/> Paranoia
<input type="checkbox"/> Body sores	<input type="checkbox"/> Other: _____		

**Incident Report Written?**     Yes     No    **Incident Report Sent to TEAP?**     Yes     No



**◆ REFERRAL BASED ON ALCOHOL TEST RESULTS (Attached printout from breathalyzer if possible)**

Test 1 Result	TIME	Test 2 Result	TIME	Test 3 Result	TIME
Test 4 Result	TIME	Test 5 Result	TIME	Test 6 Result	TIME

NAME OF STAFF PERFORMING TEST:

/

(Print Name)

(Signature)

**TEAP USE ONLY**

Relevant Clinical Factors:

Recommendation for  
Suspicion Testing:

**Signature:**

**Date:**

**CENTER DIRECTOR/DESIGNEE USE ONLY**

**Drug Test** OR  **TEAP Program**

**Explain Decision:** \_\_\_\_\_

**Center Director's Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

Final Disposition: \_\_\_\_\_

TEAP Specialist Signature: \_\_\_\_\_

**SEND TO HEALTH AND WELLNESS CENTER FOR INCLUSION IN SHR**



BONUS TOPIC

# SUSPICION SCREEN PROCESS



REPLICATES WORKPLACE  
PRACTICES

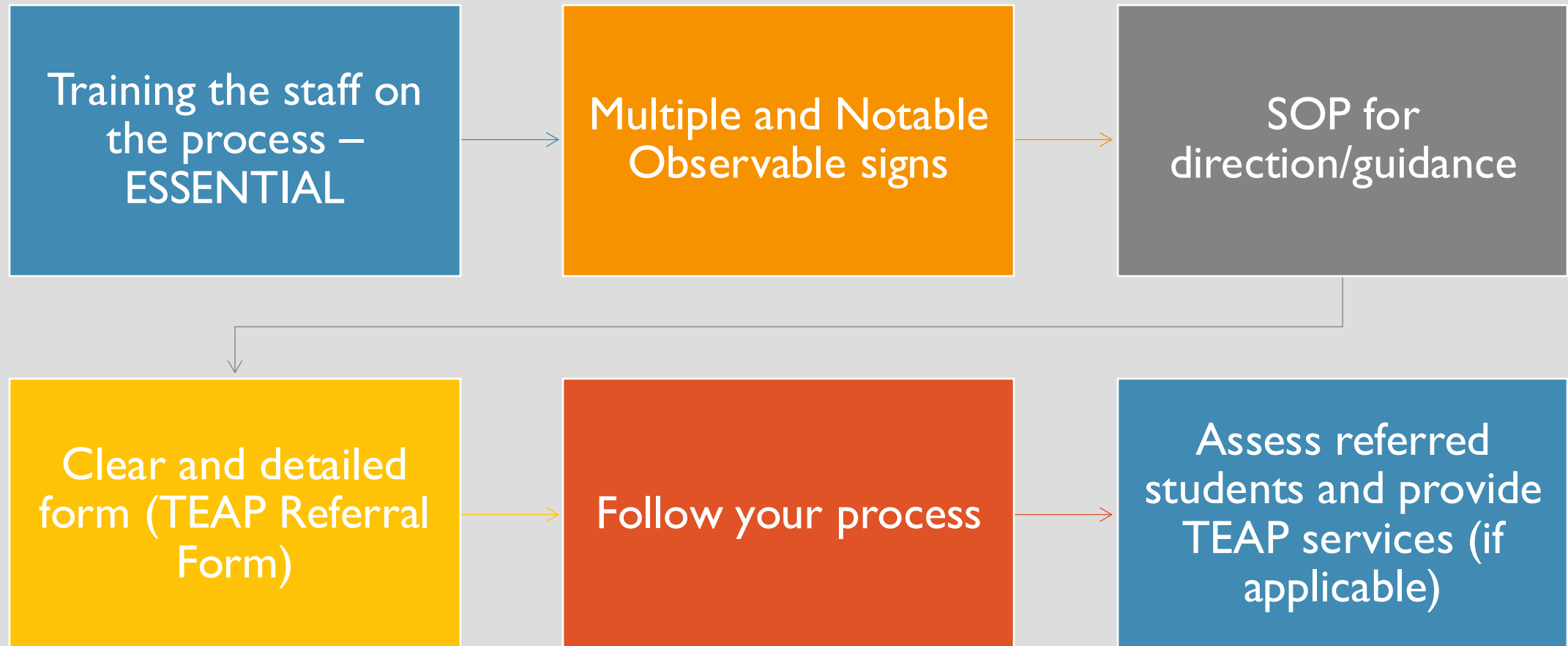


TEACHES HEALTHY WORKPLACE  
PROCEDURES THROUGH  
MODELING



ENHANCES JOB CORPS AS A SAFE  
AND HEALTHY EMPLOYMENT AND  
RESIDENTIAL SITE

# THE COMPONENTS OF AN EFFECTIVE SUSPICIOUS SCREENING PROCESS





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HEALTH  
SPECIALIST**

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# LEARNING OBJECTIVES ACHIEVED REVISE

1.) Identify resources available to ensure adherence to chain of custody procedures

*Both external and internal to Job Corps (DOT; PRH; DRG and HW website)*

2.) Review PRH regarding urine toxicology screening collection process.

*See PRH: 2.3, R5 g, l, (d)*

2.) Learn 3 core elements to maintaining chain of custody procedures.

*Train, monitor and document*

4.) Define the difference between observed and supervised urine collections.

*Supervised is managing environment while observed is reserved for concerns with adulteration*