

## ALCOHOL & DRUGS: DOT COMPLIANCE MANUAL

Supervisor training for reasonable suspicion must be conducted only once — recurrent training is not required.

### Who Is a Supervisor?

It is important to identify supervisory personnel. In the trucking industry, this is especially difficult because the dispatcher is often remote from the driver after the truck leaves the terminal and is often not present when the driver returns. The regulations prohibit any reasonable suspicion based on third-party reports. Therefore, it is important that people who are placed in positions of responsibility for assessing employee fitness be well informed as a part of their training, particularly about the limitations imposed by the regulations.

How can a motor carrier avoid potential safety risks when drivers have so little face-to-face contact with their immediate supervisors? Consider:

- **Expanding your definition of supervisor.** There is no reason that mechanics and other management and administrative personnel cannot be trained as driver supervisors, empowering them to perform the observations needed for reasonable suspicion.
- **Developing a policy for observations made by others.** By having a company policy detailing the non-DOT consequences for drivers who are reported to be under the influence of drugs or alcohol, you are dealing with a situation before it arises. (Remember: A test would not be DOT-required unless the driver's trained supervisor was to make the observations directly.) It is important that any policies created for actions under your independent authority are within the confines of state and local privacy and labor laws. Consider having an attorney review any non-DOT actions.

Some of the employees (supervisors) who have been selected for your training may be wary of why they are there. Depending upon the makeup of your trainees, apprehensive feelings may come out of nonconfrontive personalities, who would rather not get involved in "sticky" situations. Others may fear coming across as the company "Gestapo." Yet others may not totally disagree with the lifestyles of those involved with DOT-prohibited behaviors. You may need to explain to your participants why they have been selected for training.

### Training Content

Ideally, the program should be varied in its approach, using audio-visuals, written materials and stand-up presentations from administrative personnel. The latter is important in discussing the particulars of company policy as it relates to employee status following a positive test, provisions for rehabilitation if any and conditions of reinstatement. Content should specifically address the categories as outlined in the regulatory directive. Realistically, the dangers of alcohol "misuse" are far more serious and extensive than all of the illegal substances combined.