

Changes for Medical Examiners Expected to Effect Drug and Alcohol Collections in 2014

By Clinton M. Smith, DC.

As you probably already have realized, as a Certified Professional Collector or Breath Alcohol Technician, when the FMCSA changes a protocol or standard in the drug and alcohol collection business it affects you directly. New procedures and new rules challenge us all as we integrate the new requirements into our routine. Over time, we adapt and if we really think about it, can usually at some point, somewhat agree the change was for the better.

A new program rolling out on May 21, 2014 from the FMCSA will likely not directly impact your collection routines, but it will surely change your collection facility if you are teamed with a DC, DO, MD, ANP or PA. On that date, the FMCSA will put into effect the new National Registry of Certified Medical Examiners (NRCME). This program is a massive new system intended to improve the quality of medical examinations for commercial motor vehicle drivers and school bus drivers. This program is so large it has taken nearly 8 years to roll out!

The NRCME (as it is affectionately called) is a program designed to streamline and get all Medical Examiners (ME's) rowing their oars in the same direction. Prior to this program there were some examiners providing cursory exams and some over-zealous examiners limiting drivers and impeding their employment for miniscule issues. The NRCME intends to train and test approximately 200,000 examiners for over 8 million drivers and teach them the common sense approach to performing an exam. Trained Medical Examiners will have clear knowledge of the FMCSA rules, regulations and recommendations, and knowledge how to apply them in the certification of drivers.

The FMCSA expects the system will need 40,000 examiners by May 21, 2014 to keep the system moving. As more examiners come on board, the supply and demand factor will level out, but this may take a couple of years.

If your occupational health clinic employs examiners of any of the five categories: Advanced Nurse Practitioners, Doctors of Chiropractic, Doctors of Medicine, Doctors of Osteopathy or Physicians Assistants, they should already be in the certification process. If not, in order to preserve your clinic's customer base, they should get going very quickly. After May 21, if they have not certified with the FMCSA via a written test, they will no longer be able to perform DOT exams. Penalties will apply after that date. But worse, it could cripple your clinic as companies will be mandated to use NRCME examiners only for CMV and School Bus drivers and if your clinic does not have a certified Medical Examiner on staff, companies will be forced to find one at another clinic.

For those seasoned examiners, unfortunately there is no grandfathering into the NRCME program. Each and every examiner must take an accredited training program, then sit for a computer provided examination at an approved FMCSA testing site. To apply for an NRCME number, the examiner must go to <https://nationalregistry.fmcsa.dot.gov/NRPublicUI/home.seam> to first acquire an NRMCE number. That number follows the examiner through their training, which is provided commercially by numerous organizations. This training can be lecture or computer based. However, the lecture based systems simply do not have the time over a weekend to convey the detailed information the examiner needs, so computer based training has been approved and has proven to be very successful in getting ME's ready to test. The certification is good for 10 years. At that time, the ME must go through the entire program again. There is recurrent training at the 5 year mark.

Ok, so you know about the NRCME program now, so how is this going to effect your day? Picture this, 8 million drivers funneling down into 40,000 (or less!) examiners over the next three years or so until the number of examiners increases. If you think you are busy now, just wait until about the third and fourth quarters of this year! Employers will want the trio of FMCSA mandated services under one roof. They will not want to ship drivers to two or three different places to get their pre-employments, random drug or alcohol programs fulfilled. One-stop-shops will become the norm over the next couple of years, which will substantially increase business flow in your clinic. As the number of drivers continues to increase and the number of examiners drops, the number of employers looking to move as they lose their current examiner will increase. We anticipate drug and alcohol collections increasing, especially in clinics equipped with Evidential Breath Testers, as employers will want immediate confirmation testing of positive breath alcohol screening. Couple that with a fresh NRCME examiner and there is a good chance there will be an influx of new business into your clinic.

So how do you prepare? Number one, make sure your examiner (s) are training NOW. Employers are already starting to get shaky on uninformed, non-NRCME occupational health clinics and they have already started the exodus to newly minted NRCME examiners. We expect that pace will increase throughout 2014. Second, make sure your supplies are adequate. Third, make sure your Professional Collector and Breath Alcohol Technician certifications are up-to-date. Fourth, make sure you have your processing as streamlined as possible. Are you scanning COC forms? Are you scanning physical exam forms? You better be. If not, you will soon be inundated with paper. Scanning is not expensive, but make sure your scanning destination is in a secure, backed-up hard drive or is uploaded to the cloud for storage.

There has never been a better time to be in our business and the NRCME program will solidify that for years to come.

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