Human Resources Department
Drug and Alcohol Program Review
May 13, 2019

Report Highlights

Random Testing
The pool of employees subject to random alcohol and drug screenings did not include all safety-sensitive positions, as required by the Department of Transportation.

Pre-employment Screenings
Controls are not in place to ensure new hires and/or transfers complete drug screenings, in accordance with City Policy.

Contract Monitoring
Controls were effective to ensure invoices were mathematically accurate. However, performance metrics were not measured, and penalties were not assessed when permissible by the contract.

City Auditor Department
140 N 3rd Avenue Phoenix, AZ 85003
602-262-6641 (TTY use 7-1-1)
Executive Summary

Purpose

Our purpose was to determine that the Human Resources Department Safety Division’s (HR Safety) Drug and Alcohol program complies with federal regulations and City policies. We also reviewed contract monitoring procedures to determine that controls were in place to ensure that the Occupational Medical Service Provider complied with contract requirements related to the Drug and Alcohol program.

Background

The Department of Transportation (DOT) requires that everyone who applies for, or is employed in, a safety-sensitive transportation position, complete pre-employment drug, and random drug and alcohol screenings. The City developed the Alcohol and Drug Testing Program Commercial Driver’s License Federal Motor Carrier Safety Administration (FMCSA) Policy (Policy) to comply with the FMCSA. Additionally, Administrative Regulation 2.324 – Policy on Alcohol and Substance Use and Abuse (AR 2.324) identifies the City positions and/or functions subject to drug and alcohol testing.

The City contracted with Occupational Health Centers of the Southwest PA, DBA Concentra Medical Centers (Concentra), to provide occupation medical services, including drug screenings. The City paid Concentra $171,547 for drug and alcohol screenings from July 1, 2016 through June 30, 2018.

Results in Brief

The pool of employees subject to random alcohol and drug screenings did not include all safety-sensitive positions, as required by the Department of Transportation.

The DOT random pool did not include all positions required by the DOT, and was not updated as required by the City’s Policy. We identified four positions that were not in the DOT random pool. Additionally, we found that three employees who were on leave were still in the random pool, instead of being removed in accordance with the City’s Policy.

Controls are not in place to ensure new hires and/or transfers complete drug screens, when applicable, in accordance with City Policy.

We identified 970 positions that required pre-employment drug screening were filled from August 1, 2017 through June 30, 2018. Of these, 65 (7%) positions were filled without employees completing a pre-employment drug screening, as required by AR 2.324. Further, we noted approximately 9% of new hires and transfers requiring drug screening in FY 2018, did not start employment within 30 days of their screening, or were screened after their hire date. The cause appeared to be that the panel reviewed
in eCHRIS to determine if a pre-employment drug screening is needed was not always accurate.

**Firefighters and POST-certified arson investigators were not subjected to random drug screens as required by AR 2.324.**

The Fire Department (Fire) did not have a current policy for random alcohol and drug screening, as required by AR 2.324. The pools used to select employees for random testing did not include sworn firefighters or AZ POST-certified arson investigators. Fire staff informed us that they were in the process of developing a policy.

**HR Safety developed a process to ensure employees were scheduled for follow-up testing, as determined by the Substance Abuse Professional.**

During our review, HR Safety staff found that several employees had not been scheduled for follow-up testing as prescribed by the Substance Abuse Professional. HR Safety staff identified the deficiency prior to the audit, and developed detailed procedures to ensure follow-up testing is scheduled and completed for current and future employees, as needed.

**Controls were effective to ensure invoices were mathematically accurate. However, performance metrics were not measured and penalties were not assessed when permissible by the contract.**

Invoices were reviewed to ensure amounts billed were mathematically accurate each month. However, the contract outlines specific performance metrics that are not monitored or enforced.
### Department Responses to Recommendations

**Rec. 1.1** Work with each department to confirm the Position Data tab is accurate to ensure pre-employment screening is completed as required by AR 2.324.

<table>
<thead>
<tr>
<th><strong>Response</strong></th>
<th>Staff will provide training sessions to field department HR staff to communicate the importance of ensuring accurate data is entered and maintained in the Position Data Tab of eCHRIS.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Target Date</strong></td>
<td>August 3, 2019</td>
</tr>
</tbody>
</table>

*Explanation, Target Date > 90 Days:*

**Rec. 1.2**: Establish procedures and controls to maintain the accuracy of information in the Position Data tab.

<table>
<thead>
<tr>
<th><strong>Response</strong></th>
<th>Staff will establish an annual audit procedure to review departments' position data tab information to verify and ensure the accuracy of information. This will be done by running position reports by department to show all positions, including an indicator where there is a Driving or Sensitive Position Designation. Reports will then be sent to the field HR department for review and clean-up where appropriate.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Target Date</strong></td>
<td>August 3, 2019</td>
</tr>
</tbody>
</table>

*Explanation, Target Date > 90 Days: Audits will be ongoing*

**Rec. 1.3**: Establish procedures to ensure employees are only hired within 30 days of completing their drug screening, as required by AR 2.324.

<table>
<thead>
<tr>
<th><strong>Response</strong></th>
<th>Staff will provide training sessions to field department HR staff to remind departments of the hiring procedures ensuring employees are only hired within 30 days of completing their drug screening. Based on discussions with HRIS, there is not a eCHRIS system solution to ensure departments are not hiring past the 30-day mark, as there is no existing mechanism to tie Concentra PRE-EMPLOYMENT drug results to an Employee ID, a Hire Date, or a Department, that would allow us to catch this before it is too late. Staff will therefore run an “after the fact” quarterly report to see which departments did not follow policy and follow-up to request a response for the lack of compliance.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Target Date</strong></td>
<td>August 3, 2019</td>
</tr>
</tbody>
</table>

*Explanation, Target Date > 90 Days:*
**Rec. 2.1:** Review the City’s job descriptions to ensure all positions and/or functions that meet DOT’s definition of safety-sensitive positions are included in the DOT random pool.

**Response:** Staff will meet with field department HR sections and the HR Classification and Compensation Division to discuss the process of reviewing the City's job descriptions to ensure all positions and/or functions that meet DOT’s definition of safety-sensitive positions are included in the DOT random pool. | **Target Date:** August 3, 2019

**Explanation, Target Date > 90 Days:**

**Rec. 2.2:** Establish procedures and controls to ensure changes to safety sensitive positions are properly recorded in eCHRIS and are captured in the DOT random pool.

**Response:** Staff will establish procedures and controls to ensure changes to safety sensitive positions are properly recorded in eCHRIS and are captured in the DOT random pool. | **Target Date:** August 3, 2019

**Explanation, Target Date > 90 Days:**

**Rec. 2.3:** Work with Fire to develop a process to include sworn firefighters and AZ POST-certified arson investigators in random drug screening, as required by AR 2.324.

**Response:** As of July 1, 2019, the Unit 5 MOU will state: City of Phoenix Fire Department and Phoenix Fire Fighters Association Local 493 will develop a drug testing policy through the Fire Labor/Management process. The drug testing program will be administered and managed by the Fire Department. | **Target Date:** July 1, 2019

**Explanation, Target Date > 90 Days:**

**Rec. 3.1:** Identify employees in safety-sensitive positions on leave more than 30 days and ensure they complete a Return-to-Work drug screening prior to returning to work, as required by AR 2.324.

**Response:** HR staff in field departments are responsible for tracking employees’ leave to ensure employees in safety-sensitive positions on leave more than 30 days complete a Return-to-Work drug screening prior to returning to work. | **Target Date:** August 3, 2019
Our staff will provide training sessions to Department HR staff to remind departments of the Return-to-Work drug screening procedure.

Based on discussions with HRIS, there is not an eCHRIS system solution or feasible development option that can ensure departments do not return employees to work without a Return-to-Work drug screen.

### Explanation, Target Date > 90 Days:

**Rec. 3.2:** Establish and document procedures to ensure employees in safety-sensitive positions, who are returning to work after an absence exceeding 30 days, complete a drug screening, as required by AR 2.324.

**Response:** Staff will provide training sessions to Department HR staff for tracking employees’ leave to ensure employees in safety-sensitive positions on leave more than 30 days complete a Return-to-Work drug screening prior to returning to work.

Based on discussions with HRIS, there is not an eCHRIS system solution to determine 30-day absence if it is not specifically entered as a Leave of Absence (LOA).

**Target Date:** August 3, 2019

### Explanation, Target Date > 90 Days:

**Rec. 4.1:** Spot check invoices as defined in the contract to ensure employees do not experience excessive waiting periods.

**Response:** Staff will continue to review the monthly spreadsheet Concentra provides to ensure we are not experiencing excessive wait times.

**Target Date:** May 1, 2019

### Explanation, Target Date > 90 Days:

**Rec. 4.2:** Develop procedures to measure waiting periods and assess penalties, as defined in the contract.

**Response:** Staff has updated the Drug & Alcohol Invoice Processing procedures to measure waiting periods and assess the penalties. During the invoice reconciliation process, staff contacts the vendor to question reason for excessive waiting periods and determines whether penalties shall be applied.

**Target Date:** May 1, 2019
**Rec. 4.3:** Enforce the contract requirement to submit invoices by the 10th day of the month following service, or amend the contract to reflect current acceptable practices.

<table>
<thead>
<tr>
<th><strong>Response:</strong></th>
<th>Staff will amend the new contract to reflect acceptable practices.</th>
<th><strong>Target Date:</strong></th>
<th>October 27, 2019</th>
</tr>
</thead>
</table>

**Explanation, Target Date > 90 Days:** This contract will end on October 26, 2019. The recommendation will be addressed during the upcoming Request for Proposal process and the new contract will reflect the agreed upon invoice delivery method. Staff will adhere to the approved upon practice.
1 – Pre-Employment and Transfers

Background

AR 2.324 requires all new City employees entering specific job categories to pass a pre-employment, urine drug screening within 30 days of employment. See Attachment A for list of positions that require pre-employment drug screening.

The departments’ Human Resources staff review the Position Data (Data) tab in eCHRIS to determine if candidates must complete drug screenings prior to starting employment. Shared Services departments submitted a “Supervisor’s Authorization to Conduct Background Checks” to their HR Transaction Team liaison to request a drug screening, while field departments submitted drug screening requests directly to Concentra. HR Safety staff is responsible for entering drug screening results in eCHRIS and informing the hiring department that employee screening results are received.

We compared employees new to the City and employees entering Commercial Driver’s License (CDL) positions in FY 2018 to the invoices submitted by Concentra to determine if preemployment drug and alcohol testing complied with AR 2.324.

Results

The panel reviewed in eCHRIS to determine if drug screenings are needed is not always accurate.

The City hired or rehired 970 employees between August 1, 2017 and June 3, 2018 that required drug screenings based on the Data tab for the position number. During our review, we found that 65 (7%) employees were hired without completing a drug screening as required by AR 2.324. Through our review and discussions with staff, we found that the Data tab was not always accurate. HR Safety staff stated that each department is responsible for verifying that the Data tabs are accurate for their positions. Controls are not in place to ensure that Data tabs are accurate, or that they are updated as position requirements change.

Controls are not in place to ensure that new employees start employment within 30 calendar days of their drug screenings, as required by AR 2.324.

Concentra submits invoices to HR Safety of all drug screenings completed the month following the testing. We compared the list of 970 employees hired or rehired between August 1, 2017 and June 30, 2018, to the Concentra invoices, to determine if candidates started employment within 30 days of their drug screening date. We found 90 (9%) started employment more than 30 days after their drug screening, and 52 (5%) started prior to completing, or to the department receiving, their drug screening results. ECHRIS does not have a control to warn staff if drug screenings are not completed within the allotted time frames. Further, controls are not in place to ensure that drug screening results are entered for positions requiring screenings.
We noted exceptions in 21% of employees required to complete pre-employment drug screenings.

**Controls are not in place to ensure existing employees entering CDL positions complete drug screenings, as required by AR 2.324.**

AR 2.324 requires that current employees, who transfer from a non-CDL to a CDL position, complete drug screening. We identified 35 employees who promoted or transferred from a non-CDL into a CDL position from July 1, 2017 – June 30, 2018. Of these, 14 were screened in accordance with City Policy. We noted 17 (46%) were not screened, and 4 (11%) did not start their new positions within 30 days of their drug screening, as required by AR 2.324. This was due to the Data panel having “Driving Position” selected instead of “CDL Position.” We confirmed the employees were included the random pool as required.

**Recommendations**

1.1 Work with each department to confirm the Position Data tab is accurate to ensure pre-employment screening is completed as required by AR 2.324.

1.2 Establish procedures and controls to maintain the accuracy of information in the Position Data tab.

1.3 Establish procedures to ensure employees are only hired within 30 days of completing their drug screening, as required by AR 2.324.
2 – Random Testing

Background

AR 2.324 required random drug testing for the following positions and/or functions:

- CDL Operators (includes personnel eligible to work out-of-class in a CDL position)
- Sworn Police Officers
- Sworn Firefighters
- POST-Certified Arson Investigators

DOT agencies establish minimum random testing rates for safety-sensitive positions under their agencies. The City’s Policy was developed to comply with the DOT’s FMCSA drug and alcohol screening requirements. The 2018 testing rates of the FMCSA regulated population were 10% for alcohol and 25% for drugs.

2018 DOT Drug and Alcohol Random Testing Requirements

The DOT sets random testing rates annually.

HR Safety manages the City’s DOT and sworn Police Officers random testing pools. The Police Department (Police) Operation Order 3.21 Controlled Substance Screening (Ops Order) required 25% of the average number of positions in the random pool be tested annually.

HR Safety staff generated two random testing lists each Friday: One for DOT-regulated positions and one for sworn Police Officers. Designated department contacts received
the list of selected employees in their departments, so they could inform selected staff. The City Policy requires employees to report to the nearest testing facility when they are notified that they were selected for testing. Departments were given seven days to notify their employees. The department contact notified HR Safety staff when a test could not be completed. If the test was not excused, the employee was considered to have tested positively.

We reviewed the City’s random pools to determine if all required positions were included. We also verified compliance with the 2018 minimum testing rates. We compared the random selection date to the test completion date (per the invoice) to ensure that tests were completed timely. We also selected a sample of incomplete tests to determine if the excuses were reasonable.

Results

The DOT Random pool did not include all positions required by DOT and was not updated, as required by the City’s Policy.

DOT required that safety-sensitive positions in the following agencies be included in the random drug and/or alcohol testing pool:

- FMCSA
- Federal Aviation Administration (FAA)
- Federal Railroad Administration (FRA)
- Federal Transit Administration (FTA)
- Pipeline & Hazardous Materials Safety Administration (PHMSA)

The City’s DOT Random pool was generated from eCHRIS. Employees included in the random pool were:

- In positions with duties or activities that require a CDL (class A, B),
- Employed in out-of-class driver positions,
- Employed in Federal Emergency Management Agency (FEMA) driver positions,
- Employed in third-party CDL tester positions, or
- Noted as holding an FAA license.

We confirmed that all employees who fell under the City’s categories were included in one of the random pools. However, through discussions with HR Safety staff, and reviews of the City of Phoenix Pay Plan, we identified four positions that met the FAA’s safety-sensitive position definition that were excluded from the pool, because they did not have FAA selected as their license type. A risk exists that additional positions identified by DOT agencies are not included in the DOT random testing pool.
The City’s Policy required that employees on leave for more than 30 days be removed from the City’s DOT random pool. During our review, we found three inactive employees who were not removed from the random pool, as required by the City’s Policy.

**The Police random pool included all positions required by the Ops Order.**

The Ops Order required sworn police personnel be included in the DOT random pool (sworn personnel covered by FMCSA or the FAA) or the Police Random Pool. Non-sworn personnel are only screened during the pre-employment process, unless they fall under the DOT random pool.

### Police Screening Requirements

<table>
<thead>
<tr>
<th>DOT Random Pool</th>
<th>Non-DOT Random Pool</th>
<th>Police Applicants (pre-screening)</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Employees covered by FMCSA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Employees covered by FAA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Sworn employees not subject to the DOT random pool</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• All applicants for recruit positions and reinstatements to sworn positions</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• All applicants for civilian, volunteer, and intern positions</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Non-sworn employees are not subject to random screening, unless they fall under the DOT random pool.

We compared the sworn Police officers on the December 2018 payroll report to the Police random pool report. All positions were in the DOT random or Police random pools as required by Ops Order 3.12. No exceptions were noted.

**2018 random drug and alcohol screening for CDL positions and sworn Police met the minimum requirements established by DOT and Police Ops Order 3.12.**

We compared the total random alcohol and drug screenings completed in 2018, to the populations in the random pools, to determine if the minimum requirements established by DOT and Ops Order 3.12 were met. DOT alcohol and drug screenings completed exceeded the minimum required without exception.
Random screening complied with applicable policies.

**Random drug and alcohol screening was not completed for sworn Fire Fighters.**

AR 2.324 states that employees in sworn Police, sworn Fire, and POST-certified arson investigator positions are subject to drug and alcohol testing as required by their departmental policies.

Sworn Firefighters were not included in random testing. We contacted Fire HR staff and were informed their policy was outdated and that Fire was working with HR Safety and the Law Department to create a drug and alcohol screening program.

**Recommendations**

2.1 Review the City's job descriptions to ensure all positions and/or functions that meet DOT’s definition of safety-sensitive positions are included in the DOT random pool.

2.2 Establish procedures and controls to ensure changes to safety sensitive positions are properly recorded in eCHRIS and are captured in the DOT random pool.

2.3 Work with Fire to develop a process to include sworn firefighters and AZ POST-certified arson investigators in random drug screening, as required by AR 2.324.
3 – Additional Testing

Background

In addition to pre-employment and random drug screens, employees may be screened if they meet the following criteria:

Additional Testing Reasons

<table>
<thead>
<tr>
<th>Return to Work/ Duty Testing</th>
<th>Follow-Up Testing</th>
<th>Reasonable Suspicion/For Cause</th>
<th>Post-Accident</th>
</tr>
</thead>
<tbody>
<tr>
<td>Returning to DOT-regulated positions after being involved in a rehabilitation program</td>
<td>Employees that returned to work after a positive test. Testing schedules are determined by the City’s Substance Abuse Professional</td>
<td>A supervisor or City official has reasonable suspicion that an employee has shown impairment</td>
<td>Employees are cited, and there is a fatality, bodily injury requiring medical assistance, or a disabled/damaged vehicle.</td>
</tr>
<tr>
<td>Returning to DOT-regulated positions after absense &gt; 30 days (and has not been subject to random tests)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Accident criteria is established by DOT.

We reviewed the Return-to-Work, Follow-Up, and Post-Accident testing processes to ensure all employees completed testing as required by the City’s Policy.
Results

**Controls are not in place to ensure Return-to-Work drug screenings (referred to as pre-placement drug tests by the DOT) are completed for DOT-regulated employees who are on leave for more than 30 days.**

HR Safety staff was not made aware of DOT-regulated employees who were on leave for more than 30 days. Therefore, there was no way to ensure that all employees were scheduled for a Return-to-Work drug screening, as required by City Policy.

**HR Safety did not have an effective process to ensure follow-up testing was scheduled, as required by City Policy.**

HR Safety staff reviewed their follow-up testing procedures prior to our review. They informed us that not all employees were scheduled for follow-up testing as determined by the City’s Substance Abuse Professional. HR Safety developed procedures to ensure all employees complete the necessary testing in the future during the course of the audit.

**We confirmed that all employees (reported to us by HR Safety) who met the criteria for post-accident testing, were screened in accordance with City Policy. However, we could not confirm that the list provided by HR Safety was complete.**

Departments were responsible for notifying HR Safety when an employee was sent to Concentra for post-accident testing. Per HR Safety, there is no report available that identifies CDL employees who are involved in accidents. A risk exists that employees meeting the post-accident screening criteria are not sent to Concentra, as required by City Policy. HR should send periodic training reminders to departments to ensure they are aware of, and follow, all post-accident testing requirements.

Recommendations

3.1 Identify employees in safety-sensitive positions on leave more than 30 days and ensure they complete a Return-to-Work drug screening prior to returning to work, as required by AR 2.324.

3.2 Establish and document procedures to ensure employees in safety-sensitive positions, who are returning to work after an absence exceeding 30 days, complete a drug screening, as required by AR 2.324.
4 – Contract Monitoring

Background

In October 2014, the City entered into a three-year agreement (no. 139906) with Occupational Health Centers of the Southwest PA, DBA Concentra Medical Centers (Concentra), to provide occupation medical services, including alcohol and drug screening. The contract allowed for two, one-year extensions. The last extension was executed in October 2018 and will expire in 2019.

We reviewed HR Safety’s contract monitoring procedures, as they relate to alcohol and drug screening, to ensure that invoices were mathematically accurate and that performance guarantees were monitored and enforced.

Results

Controls were in place to ensure invoices were mathematically accurate.

We reviewed 57 invoices for services completed from July 2016 through June 2018. We found invoices were reviewed and adjusted, when necessary. However, three invoices (5%) included out-of-state screenings. These were paid without a contracted rate established in the contract.

HR Safety does not have a process in place to ensure City employees do not experience excessive waiting times, as defined by the contract.

The contract states “HR Safety staff will randomly spot check work status reports to ensure employees do not experience excessive waiting periods. A random spot check of 25 reports resulting in more than 10 or more instances of excessive waiting would result in a penalty of $200 that would be reduced from the following monthly billing.” Excessive waiting periods were defined as longer than a one-hour turnaround time at the clinic. The contract allows up to two spot checks per quarter. HR Safety did not have a process to review work status reports. Excessive waiting periods reduces work productivity, impacting the work area.

Invoices were not always submitted timely; corresponding penalties were not assessed in accordance with the contract.

The contract states, “Invoices will be submitted for payment no later than the 10\textsuperscript{th} day of the month following the month of service. Billing for services that are received later than the 10\textsuperscript{th} day of the month, following the month of service or that are missing proper supporting documentation will be reduced by 10\%. Billing for services that are received later than the 10\textsuperscript{th} day of the second month following the month of service, will be reduced by an additional 10\%.” HR Safety staff informed us that invoices are hand delivered during their monthly meeting with Concentra, which is held on the second Tuesday of every month.
We found six invoices were submitted late. Two invoices were submitted after the 10\textsuperscript{th} day of the second month following service. The total penalty identified was $3,017.

**Recommendations**

4.1 Spot check invoices as defined in the contract to ensure employees do not experience excessive waiting periods.

4.2 Develop procedures to measure waiting periods and assess penalties, as defined in the contract.

4.3 Enforce the contract requirement to submit invoices by the 10\textsuperscript{th} day of the month following service, or amend the contract to reflect current acceptable practices.
### ADDENDUM – AR 2.324 POLICY ON ALCOHOL AND SUBSTANCE USE AND ABUSE

City of Phoenix
Drug Testing/Disclosure Categories

<table>
<thead>
<tr>
<th></th>
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</thead>
<tbody>
<tr>
<td>CDL Operators</td>
<td>✓</td>
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<td>✓</td>
<td>✓</td>
<td>✓</td>
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<tr>
<td>Access to criminal justice information</td>
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<td>✓</td>
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</tr>
<tr>
<td>Access to drug / medical information</td>
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<td>✓</td>
<td>✓</td>
<td>✓</td>
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<tr>
<td>Occupies a Driving Position**</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Works with gases / hazardous materials</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Assigned to Homeland Security</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Regularly/directly works with children or vulnerable adults</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Sworn Police Officers</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Sworn Firefighters</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>POST-certified arson investigators</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
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</tr>
<tr>
<td>Assigned to the Crime Lab</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Interdiction or enforcement of federal drug laws</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
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</tr>
<tr>
<td>Occupies a federally-funded position</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>All other City employees</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>

* Post-Accident Testing – Non-CDL employees involved in an accident may also be required to complete post-accident drug and alcohol testing if the employee’s conduct or behavior at the accident scene leads supervisors to suspect impairment (reference Section IV.E of AR 2.324).

** Driving Position Definition: A job that requires driving a vehicle on City business regularly, on average once a week, and/or employee receives a transportation allowance from the City of Phoenix as part of compensation (reference AR 2.96, Driver Qualification, Section II).
Scope, Methods, and Standards

Scope

We reviewed the Alcohol and Drug program transactions from July 1, 2016 through December 31, 2018.

Methods

We used the following methods to complete this audit:

- We interviewed HR Safety staff to gain an understanding of their processes and procedures.
- We verified that HR Safety staff included all safety-sensitive positions (as defined by the DOT) in their random pool.
- We validated that all sworn police officers were included in the random pool, as required by the Police Department’s Ops Order.
- We reviewed eCHRIS reports to verify data was complete and accurate.
- We compared new hire reports to Concentra invoices to determine if drug screens were completed as required by AR 2.324.
- We verified that employees completed random drug testing when selected, as required by the City’s Policy.
- We identified alcohol and drug screening performance metrics in the Concentra contracts.
- We reviewed HR Safety staff’s processes to ensure performance metrics were monitored.
- We verified that HR Safety staff’s invoice review process was adequate to ensure that invoices were mathematically accurate, and screening was billed correctly.

Unless otherwise stated in the report, all sampling in this audit was conducted using a judgmental methodology to maximize efficiency based on auditor knowledge of the population being tested. As such, sample results cannot be extrapolated to the entire population and are limited to a discussion of only those items reviewed.

Standards

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the performance audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.