

*E*valuation



*R*eport

BASIS FOR RECENT POLICY CHANGES TO THE
DRUG TESTING RATE FOR DOD CIVILIANS

Report No. 99-064

December 31, 1998

Office of the Inspector General
Department of Defense

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Acronyms

DHHS	Department of Health and Human Services
DoT	Department of Transportation
TDP	Testing Designated Position



INSPECTOR GENERAL
DEPARTMENT OF DEFENSE
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ARLINGTON, VIRGINIA 22202

December 31, 1998

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR POLICY
DOD COORDINATOR FOR DRUG ENFORCEMENT
POLICY AND SUPPORT

SUBJECT: Evaluation Report on the Basis for Recent Policy Changes to the Drug
Testing Rate for DoD Civilians (Report No. 99-064)

We are providing this report for review and comment. We considered comments from the Deputy Assistant Secretary of Defense for Drug Enforcement Policy and Support on a draft of this report in preparing the final report.

DoD Directive 7650.3 requires that all recommendations be resolved promptly. Management comments were not responsive to the recommendations. Therefore, we request that the Deputy Assistant Secretary of Defense for Drug Enforcement Policy and Support reconsider her position on Recommendation 1. and provide comments on Recommendation 2. by March 1, 1999.

We appreciate the courtesies extended to the evaluation staff. Questions on the evaluation should be directed to Mr. James A. O'Connell at (757) 766-3816 (jo'connell@dodig.osd.mil) or Mr. Michael A. Joseph at (757) 766-9108 (mjoseph@dodig.osd.mil). See Appendix B for the report distribution. The evaluation team members are listed inside the back cover.

A handwritten signature in black ink, reading "Robert J. Lieberman".

Robert J. Lieberman
Assistant Inspector General
for Auditing

Office of the Inspector General, DoD

Report No. 99-064
(Project No. 8LF-9018)

December 31, 1998

Basis for Recent Policy Changes to the Drug Testing Rate for DoD Civilians

Executive Summary

Introduction. Executive Order 12564, "Drug-Free Federal Workplace," September 15, 1986, requires all agencies within the Executive Branch to develop drug-free Federal workplace programs. Each program was to include mechanisms promoting the deterrence of drug use and a means to detect drug use through random testing. Each DoD Component developed drug-free workplace plans, including the designation and random selection of employees to be tested. On November 17, 1997, the DoD Coordinator for Drug Enforcement Policy and Support modified DoD policy by requiring a minimum 25-percent random drug testing rate, effective April 1, 1998. The testing rate will increase to 50 percent effective April 1, 1999. The direct costs for the program were \$2.45 million in FY 1997. We estimate that the direct costs for the program would increase by about \$1.37 million annually due to the full implementation of the 50-percent testing rate.

Objective. Our objective was to evaluate the basis for recent policy changes to the drug testing rate for DoD civilians.

Results. Although we fully support efforts to eliminate drug misuse by DoD employees, it is essential that limited resources be focused on the most cost-effective means of doing so. The decision to establish a 50-percent minimum drug testing rate for civilians was not supported by any cost-effectiveness analysis and was at least partially based on a misinterpretation of another Federal agency's policy. There is undue focus on the testing rate, as opposed to how positions are designated for testing and what measures are taken if high positive test results occur. As a result, there is no assurance that the additional direct costs and unquantified administrative burden and productivity losses associated with the increased testing rate will be offset by any noticeable progress toward a drug-free workplace. For details of evaluation results, see Finding section of the report.

Summary of Recommendations. We recommend that the DoD Coordinator for Drug Enforcement Policy and Support revise the random drug testing policy to require a minimum 10 percent test rate for DoD Components. Also, we recommend that DoD Components be required to take additional steps when positive test rates are 1.0 percent or more. Additional steps should be based on an evaluation of the Components' drug testing plans to determine which segments need emphasis. This could include increasing awareness, drug testing, training, or any combination thereof. We believe that these recommendations constitute a more cost-effective and comprehensive management approach than across-the-board high test rate requirements. Revising the minimum

required test rate to 10 percent would allow DoD to use up to \$1.32 million annually, or \$7.92 million over the Future Years Defense Program for FYs 2000 through 2005, for other requirements. This amount could be reduced by the cost of additional steps taken when positive test rates are 1.0 percent or more.

Management Comments. The Deputy Assistant Secretary of Defense for Drug Enforcement Policy and Support nonconcurred with the interpretation of the information in the report and the recommendation to require a 10-percent minimum testing rate, stating that a low probability of detection has little deterrence value in affecting the habits of a drug abuser. The Deputy Assistant Secretary stated that increasing the testing rate from 10 percent to 50 percent increases the probability of detecting a drug abuser five fold, shortens the time to detection five fold, and meets the intent of Executive Order 12564 in attaining a Federal drug-free workplace. See the finding for a summary of management comments and the Deputy Assistant Secretary of Defense for Drug Enforcement Policy and Support Comments section for the complete text of the comments.

Evaluation Response. Management comments on the recommendation to revise civilian random drug testing were nonresponsive. The comments contained an incorrect interpretation of randomness and probability, and they did not address issues raised in the report that support the recommendation. Management did not comment on the recommendation to strengthen programs for drug-free workplaces. Therefore, we request that the Deputy Assistant Secretary of Defense for Drug Enforcement Policy and Support provide comments on both recommendations by March 1, 1999.

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Background

Executive Order 12564, "Drug-Free Federal Workplace," September 15, 1986, provides policy for the establishment of drug-free workplace plans for all agencies within the Executive Branch. Each agency is required to develop a plan that includes:

- a statement of policy on the agency's expectations regarding drug use and anticipated actions in response to identified drug use;
- an employee assistance program emphasizing high level direction, education, counseling, referral to rehabilitation, and coordination with available community resources;
- supervisory training to assist in identifying and addressing illegal drug use;
- provisions for self-referrals and supervisory referrals to treatment; and
- a provision for identifying illegal drug users, including testing on a controlled and carefully monitored basis in accordance with this Order.

The Executive Order does not mandate a specific testing rate. Rather, it states:

The head of each Executive agency shall establish a program to test for the use of illegal drugs by employees in sensitive positions. The extent to which such employees are tested and the criteria for such testing shall be determined by the head of each agency, based upon the nature of the agency's mission and its employees' duties, the efficient use of agency resources, and the danger to the public health and safety or national security that could result from the failure of an employee adequately to discharge his or her position.

The Office of National Drug Control Policy assumed the lead oversight and policy responsibility for the Executive Order in March 1991. Under its authority, in January 1992, the Interagency Coordinating Group Executive Committee issued guidance for selection of testing designated positions (TDPs). Specifically, its purpose was to consolidate changes resulting from court decisions into guidance for selection of TDPs, to provide agencies a guide for their reexamination of TDPs, and to simplify the steps necessary to make changes to agency testing programs based on their reexamination. This guidance was supplemented in June 1993 due to additional court decisions and recurring questions regarding the TDP classifications.

The Substance Abuse and Mental Health Service Administration, Department of Health and Human Services (DHHS), provides oversight and coordination of all Federal agencies' drug-free workplace plans. It reviews and approves the plans for each DoD Component to ensure compliance with the Executive Order.

Objective

The objective of the evaluation was to evaluate the basis for recent policy changes to the drug testing rate for DoD civilians. See Appendix A for details on the evaluation scope and methodology.

Support for the DoD Drug Testing Rate

The decision to establish a 50-percent minimum drug testing rate for civilians was not supported by any cost-effectiveness analysis. The imposed increased test rate was higher than the unwritten Federal minimum requirement of 10 percent, was at least partially based on a misinterpretation of Department of Transportation (DoT) policy, and there was little support that quantified the benefits of increased testing or consideration of other relevant factors. Variability among the DoD Components' missions and the sensitivities of employees' duties suggest that one rate may not be appropriate for all Components. As a result, there is no assurance that the additional direct costs of approximately \$1.37 million and the unquantified administrative burden associated with the increased testing rate will be offset by any noticeable progress toward a drug-free workplace. Revising the minimum DoD required test rate to the unwritten Federal minimum of 10 percent would allow DoD to use up to \$1.32 million annually (\$7.92 million over the Future Years Defense Program for FYs 2000 through 2005) for other requirements.

DoD Civilian Drug Testing Policy

DoD policy for implementing Executive Order 12564 was originally published in DoD Directive 1010.9, "DoD Civilian Employee Drug Abuse Testing Program," August 23, 1988. The DoD Coordinator for Drug Enforcement Policy and Support (the Coordinator) is responsible for the overall policy, administration, and technical and scientific aspects of the drug-free workplace program within DoD.

The Directive requires that DoD Components develop a plan and implementing documents for achieving the objective of a drug-free workplace. The plan will provide for testing applicants and employees for the use of illegal drugs. Employees can be tested based on voluntary submission, reasonable suspicion, as a result of an accident or unsafe practice, and as part of a counseling or rehabilitation program. In addition, the plan will provide for random testing of employees in sensitive positions. The extent to which such employees are randomly tested and the criteria for such testing shall be determined by the head of each DoD Component, based on the mission of the Component and on the employees' duties; the efficient use of resources; and the danger to public health and safety or to U.S. national security that might result from the failure of an employee to discharge his or her position adequately. The Coordinator must approve the implementing documents and TDPs for each DoD Component.

As of April 1, 1998, DoD Components no longer determine the extent to which employees in sensitive positions are tested. The Coordinator modified DoD Directive 1010.9 on November 17, 1997 to require a minimum random testing rate of 25 percent and 50 percent effective April 1, 1999. The direct costs of the program are expected to increase from \$2.45 million in FY 1997, the last full year at old testing rates, to \$4.42 million in FY 2000, the first full year at the 50-percent testing rate. We estimate that about \$1.37 million of the \$1.97 million

increase is due to the implementation of the 50-percent testing rate. The \$1.37 million includes \$0.05 million for Components, that tested below a 10-percent rate in FY 1997, to reach the 10-percent rate. The remaining \$0.60 million (\$1.97 million less \$1.37 million) increase results from expected increases in TDPs or increases associated with Components with personnel statistics that are classified. The Coordinator did not estimate indirect costs such as employee and supervisory lost productivity associated with an estimated 15,000 additional tests. However, even if only one hour of productivity is lost per test, the cost of 15,000 hours of lost productivity is considerable. The implementing memorandum merely asserted that the standard rate will eliminate variability in agency testing rates, is reasonable statistically, and will match the DoT testing rate

Minimum Drug Testing Rate

Federal Requirement. The new DoD minimum testing rate of 50 percent is higher than the Federal requirement. Although not documented in writing, personnel at DHHS, who are responsible for approving Federal agency plans, stated that a minimum random testing rate of 10 percent is required before they consider a plan to be in compliance with Executive Order 12564. The DoD Components that have an active drug-free workplace program have plans that DHHS approved. Table 1 shows approved and FY 1997 actual testing rates of selected DoD Components. Five Components were not included because their data were either classified or not received, or their drug-free workplace plans were on hold pending DHHS approval or court injunction.

Table 1. FY 1997 DoD Component Random Testing Rates

<u>Component</u>	<u>Number of TDPs</u>	<u>Planned Test Rate (Percent)</u>	<u>Actual Test Rate (Percent)*</u>
Air Force	23,068	25	17.4
Army	7,712	100	75.0
Defense Contract Audit Agency	1,631	4	3.8
Defense Logistics Agency	7,085	20	21.1
Defense Security Service	2,617	10	2.4
Defense Special Weapons Agency	569	20	1.6
Inspector General, DoD	1,307	10	7.9
Navy	24,488	50	45.5
Uniformed Services, University of Health Sciences	150	40	42.7
Washington Headquarters Services	3,800	10	9.8

*The actual test rate was calculated from random test data included in FY 1997 annual drug-free workplace reports. Other testing, such as applicant testing, is also accomplished.

The overall DoD actual test rate for Components listed in Table 1 was 31.9 percent of the total TDPs, which is considerably higher than the 10 percent required to comply with the Executive Order.

Support for Increased Testing. The decision to establish a 50-percent minimum drug testing rate for civilians was not supported by any cost-effectiveness analysis. Further, the Coordinator could not support the assertion that the increased drug testing rates would increase deterrence from drug misuse nor quantify expected increases in the detection of drug misuse. Our literature search of two university libraries, the Internet, and three governmental research activities also failed to provide any corroborating evidence that increased drug testing rates will increase deterrence and detection. We did, however, find a survey of drug testing programs implemented by private industry.

The American Management Association published a study of private companies, "1996 AMA [American Management Association] Survey: Workplace Drug Testing and Drug Abuse Problems," April 1996, that concluded, "... no finding in our ten annual surveys since 1987 can confirm with statistical certainty that drug testing deters drug use." However, companies that combine testing programs with one or more anti-drug initiatives (such as education programs, employee assistance programs, and supervisory training) consistently reported lower positive test rates (a positive test result indicates drug misuse) than companies that only test for drug use. The study found that, as more employees

are tested for reasons other than suspicion of use, the positive test rates fall. However, it also pointed out that declining positive test rates reflect changes in testing policies rather than a decline in drug misuse. The average positive test rate for 1994 and 1995 for civilian companies surveyed was 1.9 percent. The overall positive test rate of 0.6 percent for DoD Components listed in Table 1 was considerably less than the average 1.9 percent.

Variability Among Missions and Sensitivity of Positions

Missions of DoD Components. Each DoD Component has a unique mission; thus, Component drug testing plans were developed to address specific agency requirements. Variation among Components' drug testing plans is inherent to a drug-free workplace program. The Executive Order requires that the criteria for testing be determined by the head of each agency, based on the nature of the agency's missions and its employees' duties. It is also based on efficient use of agency resources and the risks of danger to public health and safety or national security. Table 1 showed the variability of actual testing rates for DoD Components. Non-DoD Federal agencies also applied testing rates that were tailored to their specific mission requirements. Table 2 shows the FY 1996 actual testing rates for 10 non-DoD Federal agencies with the largest number of TDPs. We obtained the data from the FY 1996 Federal Drug-Free Workplace Program Annual Survey.

Table 2. FY 1996 Non-DoD Federal Agency Actual Testing Rates

<u>Agency</u>	<u>Total TDPs</u>	<u>Random Test Rate (Percent)</u>
Bureau of Prisons	27,000	4
Department of State	12,400	6
Department of the Interior	9,732	0
Department of Transportation	31,551	26
Department of Veterans Affairs	122,096	0
Drug Enforcement Agency	7,027	18
Federal Bureau of Investigations	25,038	3
Immigration and Naturalization Service	15,575	5
U.S. Customs Service	17,102	9
U.S. Secret Service	<u>4,824</u>	16
Total	272,345	

Testing Based on Sensitivity of Positions. Employees' duties vary among DoD Components to coincide with the unique missions. Drug testing programs require an evaluation of the sensitivity of positions to determine which positions are TDPs. DoD Components' classifications of TDPs varied based on the sensitivity of the position, particularly those positions requiring security clearances as shown below.

- The Army does not use security clearance status as a TDP determination factor. Its criteria for determining TDPs include whether positions are in the area of aviation, chemical and nuclear surety programs, drug control program, and police and guards.
- The Navy requires designating as TDPs all positions filled by employees with a top secret clearance and employees with a secret clearance, who have access to special access programs.
- The Defense Contract Audit Agency designates positions as TDPs when employees have active top secret, secret, or confidential clearances. If employees do not require access to classified information, their clearances are placed in an inactive status and the employees are excluded from the TDP pool used for random selection for drug testing.

The above examples show how different Components applied the TDP guidance by considering the agency's mission, employee's duties, and efficient use of agency resources. Although the Army had the highest planned and actual testing rates among DoD Components (100 percent and 75 percent, respectively), it had the most restrictive pool of candidates. We did not validate the rationale for determining TDPs by Component. We simply collected the information to use in demonstrating that a consistent DoD program cannot be achieved by dictating a test rate. By establishing a mandatory test rate without considering other factors such as TDPs, the Coordinator clearly did not fulfill his objective of providing consistency to the DoD program. Furthermore, because of the large variance in functions performed and in the sensitivity of positions across DoD Components, we believe that DoD Components need the flexibility provided in the original DoD Directive 1010.9.

Department of Transportation Policy

The Coordinator stated that the revised DoD policy for a 50-percent minimum drug testing rate was modeled after the DoT testing rate. That was an incorrect interpretation of DoT policy. DoT *employees* have been tested at a 25-percent rate since 1992. The DoT policy cited by the Coordinator is contained in 49 CFR, Part 382, "Controlled Substances and Alcohol Use and Testing," and applies to any person or employer in *private industry* who operates a commercial motor

vehicle in commerce in any state. The policy requires a minimum random drug testing rate of 50 percent. However, if the percentage of positive test results falls below 1.0 percent, the testing rate can be reduced to 25 percent. If the positive test rate later increases to 1.0 percent or greater, the drug testing rate will be increased to 50 percent. Table 3 shows the positive test results for selected DoD Components for FY 1997.

Table 3. FY 1997 Positive Test Results from Random Testing

<u>Component</u>	<u>Number Tested Positive</u>	<u>Percent of Total Tested</u>
Air Force	32	0.8
Army	25	0.4
Defense Contract Audit Agency	1	1.6
Defense Logistics Agency	17	1.1
Defense Security Service	0	0.0
Defense Special Weapons Agency	0	0.0
Inspector General, DoD	2	1.9
Navy	60	0.5
Uniformed Services, University of Health Sciences	2	3.1
Washington Headquarters Services	<u>0</u>	0.0
Total	139	

Although 49 CFR, Part 382 does not apply to DoD, the majority of DoD Components would not be required to test at a 50-percent rate. However, one aspect of the DoT testing plan that may be beneficial is the scaled back testing rates based on the magnitude of positive test results. Variable testing rates allow for greater testing when test results indicate a larger drug misuse problem.

Conclusion

We recognize that the varying testing rates among the DoD Components appear to present vastly differing commitments to a drug-free workplace program. However, mandating a specific testing rate does not increase commitment or consistency because DoD Components use different methods to determine testing candidates. DHHS requires a minimum testing rate of only 10 percent for

compliance with Executive Order 12564. Also, DoT has been testing employees at a 25-percent rate, not the 50-percent rate cited by the Coordinator as justification for changing the DoD minimum rate to 50 percent. In FY 1997, the overall DoD testing rate for civilians was 31.9 percent. We believe that the additional quantifiable direct cost of \$1.37 million for implementing a testing rate of 50 percent, when only 10 percent is required by Federal policy, would need to be based on a credible cost-effectiveness analysis. Such an analysis has not been performed.

No evidence of measurable benefits could be attributed to increased testing. The American Management Association study stated that, as testing increases, the percentage of drug users detected diminishes. Therefore, a management decision on how much to spend to detect fewer users is needed. That decision cannot be made until the benefits of additional testing are quantified. In the absence of quantified benefits, we believe that a multi-initiative approach to improving Components' plans would be far preferable to the flawed policy now being implemented. Our suggested alternative approach would require Components to test a minimum of 10 percent of their TDPs, to meet the DHHS unwritten requirement for compliance with the Executive Order. If they exhibit high positive test results, their plans for awareness, drug testing, and training should be evaluated and enhanced until the positive test results fall to an acceptable level. As a result, the Components with more effective drug testing programs would not be penalized with higher costs associated with higher testing rates, and management attention could be focused on Components experiencing unacceptable levels of drug misuse. In summary, although the goal of the April 1998 policy revision was laudable, it is a badly flawed initiative and should be recast.

We estimate that by requiring a minimum test rate of 10 percent, up to \$1.32 million of the additional \$1.37 million in direct cost to the Drug Interdiction and Counter-Drug Activities, Defense appropriation (97X0105) could be put to better use annually, or about \$7.92 million over the Future Years Defense Program for FYs 2000 through 2005. The \$1.37 million was reduced by \$0.05 million for direct test costs that would be incurred to bring Components that tested at less than 10 percent in 1997 up to the minimum 10-percent test rate. This estimate does not include reduced costs at Components with classified personnel statistics. It is based on allowing Components that tested at a 10-percent rate or higher in 1997 to continue testing at the 1997 rate. The \$1.32 million estimate would be reduced by the increased cost of prevention initiatives at Components that exceeded 1.0-percent positive test results. In addition, revising the minimum required test rate to 10 percent would allow an unquantifiable amount of indirect costs to be used for other requirements.

Recommendations, Management Comments, and Evaluation Response

We recommend that the DoD Coordinator for Drug Enforcement Policy and Support revise the civilian drug testing policy to:

1. Require a 10-percent minimum random drug testing rate for DoD Components.

Management Comments. The Deputy Assistant Secretary of Defense for Drug Enforcement Policy and Support, responding for the Coordinator, nonconcurred with information in the report and the recommendation. The Deputy Assistant Secretary stated that a minimum testing rate of 10 percent equates to a probability of an employee being tested once every 10 years on a random basis. A low probability of detection has little deterrence value in affecting the habits of a drug abuser. She further stated that increasing the civilian testing rate to 50 percent increases the probability of detecting a drug abuser five fold, shortens the time to detection five fold, and meets the intent of Executive Order 12564 in attaining a Federal drug-free workplace. Further, the cost-effectiveness of a drug testing program is dependent upon the effectiveness of the program execution. Finally, drug testing is a deterrent if the testing is truly random, unpredictable, and of sufficient frequency to raise the perceived risk of detection to the drug user.

Evaluation Response. Management comments on the recommendation are nonresponsive. The comments contain an incorrect interpretation of randomness and probability. For example, a testing rate of 10 percent does not equate to a probability of an employee being tested once every 10 years on a random basis. In any 10-year period, an individual may be selected never, once, twice, or any other number of times up to the number of samplings performed during the period. To guarantee that an employee is tested once every 10 years, as the comments assert, employees must be removed from the population for further samplings after they have been tested. However, when removed from the population, the employee has no possibility of further testing within the 10-year period and could abuse drugs without fear of detection. This contradicts the management comment that testing is a deterrent if the testing is unpredictable.

The comments did not address issues raised in the report that support the recommendation. Expected benefits that would justify the higher costs of increasing the testing rate were not provided. In addition, the comments referred to testing at a sufficient frequency to raise the perceived risk of detection to the drug user. We do not know of any data to support that a 50-percent testing rate is a sufficient frequency, or that our recommended 10-percent minimum testing rate is an insufficient frequency. In the absence of empirical data, we based our recommendation on the criteria used by DHHS when validating all Federal programs. Therefore, we request that the Deputy Assistant Secretary reconsider her position and provide additional comments in response to the final report.

2. Require the DoD Components to take additional steps to strengthen their drug-free workplace programs when positive test rates are 1.0 percent or more. Additional steps should be based on an evaluation of the Components' drug testing plans to determine which segments need emphasis. This could include increasing awareness, drug testing, training, or any combination thereof.

Management Comments. The Deputy Assistant Secretary of Defense for Drug Enforcement Policy and Support did not comment on the recommendation. We request that the Deputy Assistant Secretary provide comments in response to the final report.

Appendix A. Evaluation Process

Scope and Methodology

Work Performed. We reviewed the methodology the Coordinator used to support the increased random drug testing rate. We reviewed estimated budget requirements provided by each DoD Component to implement the new testing policy. We visited or contacted personnel with the Army, Navy, Air Force, Defense Logistics Agency, and Defense Contract Audit Agency to determine their policies and procedures for drug testing. Our analyses included data from the DHHS Federal Drug-Free Workplace Program Annual and Semi-Annual Surveys from FY 1993 to FY 1996. We also reviewed all DoD Components' FY 1997 annual reports that were available as of September 1998.

We interviewed DHHS personnel to obtain Federal requirements for compliance with Executive Order 12564. In addition, we interviewed personnel from the Departments of Transportation and the Interior, and the Office of Personnel Management, to obtain an understanding of drug testing criteria used by agencies external to DoD.

We performed literature searches of two university libraries and the Internet to obtain information on current drug testing practices and studies. We also contacted the Army Research Institute for Behavioral and Social Science, the Defense Manpower Data Center, and the Navy Personnel Research and Development Center

Limitations to Evaluation Scope. We did not review the implementation of the individual DoD Components' drug-free workplace programs. Because our scope was to review the justification for the DoD increased testing rate, we did not evaluate DoD Components' compliance with test plans or the management control program. We did not validate the rationale for determining TDPs by Component. We collected the TDP information to use in demonstrating that a consistent DoD program cannot be achieved by dictating a test rate.

DoD-wide Corporate Level Goals. In response to the Government Performance Results Act, the DoD has established 6 DoD-wide corporate level performance objectives and 14 goals for meeting these objectives. This report pertains to achievement of the following objective and goal.

-
- **Objective:** Maintain highly ready joint forces to perform the full spectrum of military activities. **Goal:** Recruit and maintain well-qualified military and civilian personnel. (DoD-5.2)

High Risk Area. The General Accounting Office has identified several high risk areas in the DoD. This report provides coverage of the Defense Infrastructure high risk area.

Use of Computer-Processed Data. The reliability of computer-processed data was not determined, but reliability would not affect evaluation results because our analyses focused on support for policy decisions and not on compliance with drug testing plans. Many of the organizations contacted maintained computer databases and programs for selecting employees for drug testing. We did not evaluate controls over the integrity of data in the databases or the sampling methodology and procedures used to select employees.

Evaluation Type, Dates, and Standards. We performed this program evaluation from May through September 1998 in accordance with standards issued and implemented by the Inspector General, DoD.

Contacts During the Evaluation. We visited or contacted individuals and organizations within DoD and within the DHHS, Department of the Interior, DoT, Office of Personnel Management, and the civilian community. Further details are available on request.

Summary of Prior Coverage. No prior audit coverage has been conducted on the DoD civilian drug testing program during the last 5 years.

Appendix B. Report Distribution

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Deputy Assistant Secretary of Defense for Drug Enforcement Policy and Support Comments



OFFICE OF THE DEPARTMENT OF DEFENSE COORDINATOR
FOR DRUG ENFORCEMENT POLICY AND SUPPORT

1510 DEFENSE PENTAGON
WASHINGTON DC 20301-1510

08 NOV 2008

MEMORANDUM FOR INSPECTOR GENERAL, DEPARTMENT OF DEFENSE
(ATTN: MR. JAMES O'CONNELL)

SUBJECT: Comments on Discussion Draft of Proposed Report Project No. 8LF-9018

The draft copy of the proposed report, "Basis for Recent Policy Changes to the Drug Testing Rate for DoD Civilians" has been reviewed. This office non-concurs with the interpretation of information presented in the report and the return to a 10% testing frequency for DoD Federal civilian employees.

A minimum civilian drug testing rate of 10% equates to a probability of an employee being tested once every ten years on a random basis. A low probability of detection has little deterrence value in affecting the habits of a drug abuser. Increasing the civilian testing rate to 50% equates to a probability of an employee being tested once every two years on a random basis. This increases the probability of detecting a drug abuser five fold, shortens the time to detection five fold, and meets the intent of the Presidential Executive Order in attaining a Federal drug-free workplace. The cost effectiveness of a drug testing program is dependent upon the effectiveness of the program execution. Drug testing is a deterrent if the testing is truly random, unpredictable, and of sufficient frequency to raise the perceived risk of detection to the drug user.

For further information my point of contact is Captain John Jemionek, MSC, USN, who may be contacted at (703) 693-1917.

A handwritten signature in black ink, appearing to read "Ana Maria Salazar".

Ana Maria Salazar
Deputy Assistant Secretary of Defense for
Drug Enforcement Policy and Support



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