

Breath Alcohol Testing—

Are You Really Prepared?

You got your BAT training and you're set for 5 years, right? Wrong. As the manufacturer of one of the most widely used breath alcohol testing devices in workplace testing, we get phone calls every day from panicked users who don't remember what to do as well as calls from employers who must decipher the procedure the BAT followed. The following are just a few of the situations we have encountered over the years.

You perform a screening test and get a result that is greater than or equal to .020 g/210L. As per regulations, you tell the employee not to eat, drink, smoke, chew or put anything in their mouth and begin a 15-minute waiting period. After 21 minutes (you got distracted with your paperwork) you go to the Evidential Breath Tester (EBT) and start another screening test by mistake. That test result is also above .020 g/210L. The results are attached to the Alcohol Testing Form (ATF) and the form is completed and signed and the DER is notified. The next day, the DER contacts you and asks why both printed test results say "Screening Test". Shouldn't there be an air blank before the second test?

Oops. The BAT did not verify that an air blank was performed prior to the confirmation test and therefore the test has to be cancelled. It's too late to test the subject again because it is now the next day. The employer cannot take action on a cancelled test and the BAT needs error correction training. Remember, as a BAT it is your responsibility to know that an air blank is required prior to a confirmation and to verify that the blank has been conducted by the EBT during the test process.

Both the screening test and the confirmation test are positive ($>/= .020$ g/210L). The BAT performs a successful accuracy check on the instrument but does not record it in the calibration log-book. The employer contacts the BAT to testify at an arbitration and requests that the calibration and accuracy records for the EBT device be provided immediately. Turns out that the last accuracy check performed on the EBT was 11 weeks prior to the test in question and the QAP states that an accuracy check should have been run not more than 31 days prior to a subject test.

The collection facility was not following the guidelines of the Quality Assurance Plan for maintenance of the EBT nor are they keeping accurate calibration records because the BAT did not record the accuracy check performed after the test in question. Were there other accuracy checks or even a calibration that were done and not recorded?

In this case, the collection site paid the manufacturer to download the memory of the EBT instrument and verify that no other accuracy checks or calibrations were performed prior to the subject test in question. The test was NOT cancelled.

You conduct a screening test with a result of .104, provide the wait period instructions, and wait 15 minutes with the employee. After the confirmation test result of .101, you are unsure about what the instrument prompts mean, get confused and accidentally abort the test before you get a printout of the confirmation test. You handwrite the confirmation test result

on the ATF and send the subject back to the employer.

Of course, that confirmation test is now cancelled because it was not printed out. The employer cannot take action on a cancelled test and the BAT must obtain error correction training. There were two problems here. (1) the BAT should not be getting confused about the instrument prompts—the BAT is required to understand the device's messages and commands and know what actions to take when an error message or malfunction occurs. (2) the BAT should know that it is never appropriate to overwrite the result of a confirmation test—the confirmation test result must be printed at the time the test is conducted.

Most of the questions and problems we encounter with breath alcohol testing procedures are related to positive tests. With a random testing rate of 10% and no pre-employment requirement, alcohol tests are not done as frequently as urine drug screen collections and positive tests are even less frequent so there is little opportunity for BATs to perfect their skills through repetition. On-going proficiency training is a *must*.

One of our trainers always emphasizes in his classes that "*Training is a Process, not an Event*". That is so true—five years is a long time. It is extremely important for BATs to practice with their EBT instruments to maintain proficiency over the entire period of their certification. Many collection sites have established annual or quarterly proficiency requirements for their BATs. These sessions should include some practice and review with obstacle scenarios and positive tests.

Employers should question collection sites about their training practices—just because someone has a certificate that says they were trained as a BAT three years ago does not guarantee that person is a competent and capable technician today. For every single alcohol test a BAT performs he or she must demonstrate the following skills:

- Ability to respond to the device's messages and commands.
- Know what actions to take when an error message or malfunction occurs.
- Ability to conduct an air blank or the knowledge that an air blank has been conducted.

- Perform the test correctly with respect to the manufacturer's requirements for that specific EBT and according to 49 CFR Part 40 rules.
- Identify and explain actions he/she will take when the device does not function properly (e.g. failed accuracy check).
- Explain when an accuracy check is required and identify the procedures and/or person(s), if other than the BAT, responsible for performing the calibration checks. ■

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