

## Inside this Issue

## Page

|  |             |
|--|-------------|
| <b>FTA Regulation - Section 655.45 – Remaining Audit Ready</b> | <b>2</b>    |
| <b>FTA Requirements of §655.81</b>                             | <b>3</b>    |
| <b>Reasonable Suspicion – What Supervisors Need to Know</b>    | <b>4</b>    |
| <b>Site Visits</b>   | <b>5</b>    |
| <b>Consortium Training</b>                                     | <b>6-7</b>  |
| <b>Program Orientations</b>                                    | <b>8</b>    |
| <b>Lexington Group (EAP) and DISA Resources</b>                | <b>9-10</b> |
| <b>Resource Hub</b>  | <b>11</b>   |

**April 2026**

# **CT Statewide Drug and Alcohol Testing Consortium Newsletter**

As we move into a new quarter, I'm grateful for the opportunity to continue working alongside each of you through the CT Drug & Alcohol Testing Consortium. Your commitment to compliance, accountability, and safety plays a vital role in the success of this program across our member agencies. Thank you for your partnership, and please know I'm always available to support you however I can.

**Andre Welsh - Drug & Alcohol and Insurance Consortia Manager**

✉ [awelsh@ghtd.org](mailto:awelsh@ghtd.org) | 860-380-2007

# Regulation Spotlight –§655.45

## Maintaining an Audit-Ready Random Testing Pool

### A Compliance Imperative for DERs and DAPMs

The integrity of a Drug and Alcohol (D&A) program is fundamentally dependent on the accuracy of the random testing pool. While testing execution often receives the most attention, federal compliance hinges equally on who is included in the pool.

Under 49 CFR Part 655, transit agencies are required to ensure that all safety-sensitive employees—and only those employees—are subject to random testing through a scientifically valid and continuously maintained selection process.

Failure to maintain an accurate pool is a high-risk audit finding that can undermine an otherwise compliant program.

#### Key Compliance Requirements

1. Accurate Inclusion: Include all safety-sensitive employees
2. Timely Removal: Remove employees no longer eligible
3. Continuous Monitoring: Update regularly and before random draws

#### Common Compliance Risks

- Missing covered employees
- Ineligible employees included
- Misalignment with MIS reporting

#### Recommended Internal Control: Monthly Reconciliation

**Compare pool vs HR roster**, verify inclusion, remove ineligible employees, align with MIS, and document review.

#### Need Help? Contact:

##### Jason Allen (Scheduling)

✉ Jason.Allen@disa.com | ☎ 800-211-4469 x6051

##### Candice Rouisse (Consortium Administrator)

✉ CTFTA@disa.com | ☎ 800-211-4469 x6021

# Regulation Spotlight – FTA §655.81 Oversight of Contractors, Subcontractors, Lessees, and Subrecipients

FTA recipients are responsible for more than just their own drug and alcohol program. Under §655.81, each recipient must ensure that any covered subrecipient or contractor receiving Sections 5307, 5309, or 5311 funds directly from the recipient complies with 49 CFR Part 655. FTA review guidance also makes clear that oversight should extend to contractors, subcontractors, and lessees with safety-sensitive employees.

You must ensure they have:

- A current, compliant Drug and Alcohol policy
- Proper testing for all covered safety-sensitive employees
- Accurate and timely MIS reporting
- Qualified service agents that meet Part 40 requirements
- Records and oversight documentation that show ongoing compliance

## **Important:**

- The recipient remains responsible for monitoring compliance
- Oversight should include written agreements, policy review, MIS verification, and periodic monitoring
- FTA may cite a deficiency if contractors, subrecipients, or lessees are not properly monitored
- Weak oversight is a common audit finding, even when testing is being conducted

# (RS) Reasonable Suspicion Testing: What Supervisors Need to Know

A required drug and/or alcohol test conducted when a trained supervisor or company official has reasonable suspicion that a covered employee has used a prohibited drug or engaged in alcohol misuse. The determination must be based on specific, contemporaneous, articulable observations concerning the employee's appearance, behavior, speech, or body odors.

## Reasonable Suspicion Basics

1. A trained supervisor or other authorized company official must make the determination.
2. Observations must be specific and documented.
3. Alcohol reasonable suspicion testing is allowed only when the observations are made during, just before, or just after the employee performs safety-sensitive duties.
4. Supervisors making these determinations must receive at least 60 minutes of training on drug indicators and 60 minutes on alcohol indicators.

**Note:** 49 CFR §655.43 requires reasonable suspicion decisions to be based on direct observations, not rumor, hunches, or secondhand reports. In addition, 49 CFR §655.14(b)(2) requires supervisor training before they are authorized to make these determinations. Clear documentation is essential for compliance and for supporting the testing decision during an FTA audit.

If you have any questions regarding this process, **please feel free to contact Candice at CTFTA [ctfta@disa.com](mailto:ctfta@disa.com).**

# Site Visit Announcements

Important Updates for All Consortium Members



## DER Site Visits – Feb 2026 to Dec 2026

Site visits will be scheduled during this period to:

- Review your agency's anti-drug & alcohol testing program
- Provide guidance and support
- Help you stay compliant

Visits are scheduled based on DER availability.

✉ **Contact:**

**Andre Welsh – Consortium Manager**

✉ [awelsh@ghtd.org](mailto:awelsh@ghtd.org)

All sites will be visited in **Calendar Year 2026** to ensure compliance and operational excellence. These visits will provide essential feedback and support to maintain high standards across our consortium. Stay tuned for specific dates and times for your respective site.

The site visits are an integral part of our strategy to enhance communication and operational efficiency. During these visits, we will assess current practices, offer guidance, and discuss any challenges you may be facing. Your engagement is vital to our collective success.

# Training Schedules

## **Upcoming Trainings – Monday, Apr 27, 2026**

 Location: Greater Hartford Transit District

 Address: One Union Place, Hartford, CT 06103

## **Training Details**

**Topic:** Conflict Avoidance & Conflict Resolution

**Facilitator:** Charlotte Ramseur, LMFT

## **About the Training**

### **The workshop will focus on:**

- Understanding the definition and early signs of workplace conflict
- Effective conflict resolution strategies
- Addressing conflict-related behaviors and bullying
- Tools and remedies to support a positive, safe, and productive work environment

This session is designed to be both informative and interactive, offering participants practical approaches they can apply immediately in the workplace.

 **Register by Apr 20, with Andre: [awelsh@ghtd.org](mailto:awelsh@ghtd.org)**

**Space is limited!**

# Training Schedules

## 📅 Upcoming Trainings – Tuesday, May 19, 2026

📍 Location: CTDOT Conference Room A&B

📍 Address: 2800 Berlin Turnpike, Newington, CT 06111

### 🕒 DER Training — 8:30 AM – 11:00 AM

**For: DERs, DAPMs**

#### **Topics:**

- Overview of DOT-mandated programs
- Random compliance, lab procedures, MRO role
- Audit prep & best practices

### 🕒 Post-Accident Training — 11:15 AM – 12:30 PM

**For: Supervisors & Transit Officials**

#### **Topics:**

- Post-accident decision-making
- Documentation & thresholds
- Third-party testing coordination

### 🕒 Reasonable Suspicion Training — 1:30 PM – 4:00 PM

**For: Supervisors & Transit Officials**

#### **Topics:**

- Substance misuse impact
- Behavioral signs & symptoms
- Referral process & EAP guidance

✉️ **Register by May 14 with Andre: [awelsh@ghtd.org](mailto:awelsh@ghtd.org)**

**Space is limited!**

# Program Orientations: New Designated Employer Representative (DER) and/or new Alternate DER

Our Consortium Program Orientations are designed to familiarize new DERs and/or Alternate DERs with the common aspects of federal drug and alcohol testing, including the substance abuse professional process and employee assistance program. It enables the new DER/Alternate DER to manage your agency's drug and alcohol testing program successfully.

**To schedule these program orientations, contact the Consortium  
Manager:**

**Andre Welsh**  
[awelsh@ghtd.org](mailto:awelsh@ghtd.org)



# The Lexington Group, Inc.

Your Employee Assistance Program

**Our Employee Assistance Program (EAP) is here for you and your household members.**

The Lexington Group Employee Assistance Program (EAP) offers confidential, 24/7 counseling—both in person and virtual—for employees and their household family members. Services help address personal and work-related challenges such as stress, mental health concerns, substance abuse, and family or marital issues, and also provide legal, financial, eldercare, and childcare referrals through the Life Care program. All assistance is strictly confidential and will not affect employment, promotions, or reputation.

- Stress, alcohol, or drug abuse
- Family, financial, or legal concerns
- Virtual or in-person sessions

**☎ 1-800-676-HELP (4357)**

**🌐 [www.The-Lexington-Group.com](http://www.The-Lexington-Group.com)**

**🔒 Password: “CTDrugConsort”**



# Third Party Administrator (TPA): DISA Global Solutions, Inc.

## Program Admin & Scheduling

- Candice Rouisse - Consortium Administrator
  - ✉ CTFTA@disa.com | ☎ 832-446-9898
- Jason Allen - Scheduling
  - ✉ Jason.Allen@disa.com | ☎ 800-211-4469 x6051
- Taylor Leblanc - Scheduling
  - ✉ Scheduling@disa.com | ☎ 800-211-4469 x6041

## Mobile Collectors

- Nathan Rice
- William Mauhs
- Noelle Iglesias
- Christopher Fitzpatrick

## Medical Review Officer (MRO)

Dr. Richard Weinstein, MD

University Services

Four Neshaminy Interplex, Suite 207, Trevose, PA

☎ 800-624-3784 | 📠 215-637-6998

## Accounting & Client Services

Auberey Ramon - Accounting

✉ Auberey.Ramon@disa.com | ☎ 800-211-4469

David Alexander - Sr. Manager Client Services

✉ David.Alexander@disa.com | ☎ 281-673-2400

## 📞 24-Hour Emergency Line

### **Post-Accident or Reasonable Suspicion**

☎ **1-800-967-3135 (Toll-Free)**

**Be prepared to provide:**

- 1. Your name & agency**
- 2. Phone number & incident location**
- 3. Reason for the call (Post-Accident or Reasonable Suspicion)**



# RESOURCE HUB






Your Program Resources — One Click Away

## **GHTD Consortium Website** -

<https://www.hartfordtransit.org/about/drug-alcohol-testing-consortium/>

Includes access to forms, training materials, and guidance documents.

### **Key Documents:**

-  [What Employers Need to Know About DOT Testing](#)
-  [What Employees Need to Know](#)
-  [Resources for the Designated Employer Representative \(DER\)](#)
-  [FTA Regulation Update Issues](#)
-  [Lexington Newsletters](#)

 [FTA Program Page](#)

 [FTA Drug & Alcohol Program Information](#)

Browse DOT regulations, training sessions, and compliance updates.

 [Helpful Regulations | www.fta.dot.gov/12533.html](#)

- [49 CFR Part 40 – Testing Procedures](#)
- [49 CFR Part 655 – FTA Regulations](#)

## **Employee Assistance Program**

 **1-800-676-HELP (4357)**

 [www.The-Lexington-Group.com](http://www.The-Lexington-Group.com)

 **Password: “CTDrugConsort”**

## **DISA Global Solutions, Inc.**

 [www.Disa.com](http://www.Disa.com)

 **Toll Free # 800-211-4469**