

**Office of Drug Enforcement and Program Compliance**  
**49 CFR Part 40 Interpretation**

**Question:** Is a specific medical review officer's (MRO) name required in Step 1 on the Federal Drug Testing Custody and Control Form, or can a clinic, hospital, health care organization, or MRO company name appear in the MRO Name and Address area?

**Answer:** The Department has determined that a specific physician's name and address is required in Step 1 of the Federal Drug Testing Custody and Control Form as opposed to only a generic clinic, health care organization, or company name. The name should be that of a responsible physician rather than an administrative staff member or other company official. However, a company name can appear as part of the address, provided it is followed by or includes the MRO's name. Collection sites use this address to send copies of the MRO's custody and control form, and drug testing laboratories use it to submit laboratory results to the MRO. The use of the MRO name will preclude potential compromises of confidentiality. In many cases, where only the name of a clinic, hospital or company appears on the mailing address, the laboratory results are sent to the clinic or hospital and are either circulated through numerous departments or, in some, cases never reach the MRO.

The physician named in Step 1 can be the MRO who will actually perform the verification review or the name of a physician within the practice (company), but not necessarily the one who will actually performs the verification (in those cases where there is more than one MRO working in that office or company).