

**NRC Form 890, Single Positive Test Form,
and
NRC Form 891, Annual Reporting Form for Drug and Alcohol Tests
3150-0146
Nonsubstantive Change Request**

The NRC is submitting this nonsubstantive change request in order to make updates to two NRC forms cleared under 3150-0146 (NRC Form 890, "Single Positive Test Form" and NRC Form 891, "Annual Reporting Form for Drug and Alcohol Tests"). Both forms are Portable Document Form (PDF) electronic reporting forms (e-forms). These e-forms remain an optional method to meet the required annual reporting of Fitness-for-Duty (FFD) program performance information to the NRC under 10 CFR 26.417(b)(2) and 26.717. The information provided in each e-form details the drug and alcohol testing results for the FFD program of a licensee or other entity. These forms are provided as a convenience to licensees and other entities not wishing to create their own mechanism for reporting these data.

The proposed changes would address feedback received from form users, and data reporting inconsistencies identified by the NRC in the quality assurance reviews performed on the information collected each year. These changes would improve the usability of the forms and the accuracy and consistency of information reported. No change in burden is anticipated as a result of these changes. No additional information is being collected.

The NRC is proposing the following changes to NRC Form 890, Single Positive Test Form:

- "Followup Testing Reason (optional)" field – In the current form, this text box field appears when "Followup" is selected for the "Reason for Testing" field. Based on an analysis of data collected, the common most entries received were included in a drop-down list, with a text box entry retained if the user selects the drop-down menu item "Other." The proposed field change would enhance the consistency of information provided and also may improve data entry by reducing the amount of typed information provided in the form.
- "Test Validity" field – When a user selects the entry "Substituted," a warning message will appear that provides additional guidance to ensure that the user is selecting the correct validity test result. This proposed message is intended to address data reporting inconsistencies identified in previous reporting years.
- "Substance" and "Additional Substance" fields – The current form permits the reporting of up to three substances (using the "Substance" field and two "Additional Substance" fields). Based on information received in prior years, a number of instances were identified where at least four substances were identified in an individual. The current form could not collect this required information. The NRC proposes to change the form to accommodate reporting of up to six substances.
- Subversion Attempts – This section of the form currently includes eight check box entries that a user can select, as applicable, to characterize a subversion attempt. This form section also currently includes the text box field "Please elaborate on the choice(s) selected" where the user enters a description of the subversion attempt. Based on a review of textual descriptions provided in prior reporting years, the NRC would add three text box entries, "Did not appear for testing," "Shy-bladder (no medical condition)" and "Donor admitted to subversion attempt)" These two check box entries would improve

the uniformity and accuracy of information received by the NRC. In previous years, these events were reported under the less descriptive “Other” subversion attempt check box.

- Update the location of some form fields, and hide or display additional fields based on other field selections. Both types of changes would simplify the user experience by only displaying fields applicable to specific reporting situations and improve the logical flow of information in the form.
- Revise two field names for clarity. The NRC is proposing to change the field name for the “Alcohol Testing” field to “Alcohol Specimen Tested” to describe more clearly the information to be provide in this field. In addition, the “Drug Testing” field would be revised to “Drug Specimen Tested” to describe more clearly the information to be provide in this field.

The NRC proposes the following changes to NRC Form 891, Annual Reporting Form for Drug and Alcohol Tests:

- “Identify your HHS-Certified Laboratory(ies)” – The NRC would split this text field into two text fields, “HHS-Certified Laboratory (Primary)” and “HHS-Certified Laboratory (Backup).” In the current form, the information on the two HHS-certified laboratories used by the respondent is provided in a single text field. The proposed change would improve the clarity and consistency of the information provided and assist in the tabulation of results.