

Policy, Procedure and Guideline – Managing alternate drug screening collection arrangements – ID17/66719

Purpose

The purpose of this policy is to ensure all alternate collection arrangements for drug screening in accordance with the relevant Ahpra drug screening protocol, are assessed, and recommendations made to decision makers, in a consistent manner against the established guideline.

The relevant Ahpra drug screening protocol (Ahpra protocol) is defined in the restrictions on the registrant's registration, either:

- Restrictions imposed or accepted prior to 16 September 2024: *Ahpra Drug and alcohol screening protocol – November 2015 and updated January 2023*, or
- Restrictions imposed or accepted from 16 September 2024: *Ahpra protocol: Screen for drugs*

Scope

This operational policy is established in accordance with *Ahpra Policy Framework*. It must be used and complied with by all relevant Regulatory Operations staff and decision makers.

Relevant legislation

N/A

Policy

All requests for alternate collection arrangements for drug screening must be considered for approval by the relevant National Board or its delegate, on a case-by-case basis. Case officers must only recommend the approval of alternate collection arrangements if the request meets the requirements of the Guideline below.

Alternate collection arrangements may only be considered for urine and hair screening, required to monitor compliance with restrictions. Alternate collection arrangements must not be considered for drug screening required as part of a health assessment undertaken under Part 7 or Part 8 of the Health Practitioner Regulation National Law as in force in each state and territory (the National Law).

Procedure

Case officer recommendations to the Board or delegate

Recommendations to approve or refuse a request for alternate collection arrangements must outline whether:

- the nomination is complete
- the practitioner is eligible for alternate collection arrangements, and

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Ahpra and the National Boards regulate these registered health professions: Aboriginal and Torres Strait Islander health practice, Chinese medicine, chiropractic, dental, medical, medical radiation practice, midwifery, nursing, occupational therapy, optometry, osteopathy, paramedicine, pharmacy, physiotherapy, podiatry and psychology.

- whether the alternate collection arrangements are suitable.

Nomination complete

Case officer must determine if the nomination is complete including:

- written confirmation and acknowledgements from the registrant
- written confirmation and acknowledgements from the nominated collection agent
- evidence of why alternate collection arrangements are required, and
- supporting information on how the requirements of the relevant Ahpra protocol can be met.

Eligibility for alternate collection arrangements

The case officer must assess whether the practitioner is eligible for alternate collection arrangements because they meet one of the following criteria:

- there are no Ahpra-approved collection centres within reasonable distance of the registrant's principal place of practice
- because of a health condition, it is not reasonable for the registrant to attend an Ahpra-approved centre that would otherwise be considered within a reasonable distance
- because of the registrant's personal circumstances, it is not reasonable for the registrant to attend an Ahpra-approved centre that would otherwise be considered within a reasonable distance.

Suitability of nominated collection agent

The case officer must assess if the nominated collection arrangement is suitable. This includes consideration of the following:

- qualifications of the nominated collection agent
- facilities available for collection and storage of the sample
- meets the requirements of the DAS protocol, and
- availability of the nominated collection agent.

Guideline

What is meant by alternate collection arrangements?

Ahpra has a single National Pathology Provider (NPP) and is under a contractual arrangement with the NPP for the collection and analysis of samples in accordance with the relevant Ahpra protocol. Ahpra and the NPP agree to the availability of approved collection centres for practitioners to attend for screening (Ahpra-approved collection centres).

An alternate collection arrangement generally refers to the collection of pathology samples by an entity or person (collection agent) who is not in commercial competition with the NPP. Samples collected under an alternate collection arrangement are sent to the NPP laboratory for analysis.

An alternate collection arrangement may be approved when it is determined:

- the practitioner is eligible to request an alternate collection arrangement
- the alternate collection arrangement meet the requirements of the relevant Ahpra protocol, and
- the samples can be stored and transported to the NPP for analysis while maintaining sample integrity.

Types of alternate collection arrangements

The following types of alternate collection arrangements may be nominated and considered:

- Health service entity such as a hospital or GP practice.
- An individual such as a registered pharmacist or nurse.

The nomination of another pathology service provider that is in commercial competition with the NPP to collect samples will not be considered for approval unless it is not possible or reasonable to attend an Ahpra-approved collection centre.

Eligibility for requesting alternate collection arrangements

Alternate collection arrangements are only to be considered in circumstances where the registrant provides evidence that attending an Ahpra-approved collection centre is not possible or reasonable.

Requests for alternate collection arrangements may be considered in the following circumstances:

- There are no Ahpra-approved collection centres within reasonable distance of the registrant's principal place of practice.

What is considered a reasonable distance should take into consideration the registrant's principal place of practice and residential address and should also consider the actual distance required to travel and the time to travel the expected distance (which may be influenced by traffic, condition of the road and available transport options, such as bus, car or rail). Generally, distances of up to 50km or 30 minutes of travel time one way would be considered reasonable.

- Because of a health condition, it is not reasonable for the registrant to attend an Ahpra-approved collection centre that would otherwise be considered within a reasonable distance.

A health condition that impacts on the assessment of a reasonable distance is limited to serious health conditions that render the registrant unable to use available transport options such as car, rail, or bus. This may include:

- physical disabilities
 - the requirement for inpatient treatment at a hospital or other healthcare facility, and
 - other health conditions that result in the registrant being unable to undertake independent travel such as the requirement for constant carer or medical supervision
- Because of the registrant's personal circumstances, it is not reasonable for the registrant to attend an Ahpra-approved collection centre that would otherwise be considered within a reasonable distance.

Personal circumstances that impact on the assessment of reasonable distance is limited to circumstances where the health and or safety of an immediate family member for whom the registrant is responsible for providing direct care to would be adversely affected. For example, young children or elderly parents for whom alternate care arrangements are unable to be made.

Requirements for alternate collection arrangements

All nominated alternate collection arrangements must meet the requirements of the relevant Ahpra protocol including but not limited to:

- Level of supervision
- Chain of custody
- Use of Ahpra request forms

Requirements for nominated collection agents

Practitioners applying for alternate collection arrangements should nominate registered health practitioners in the first instance.

In exceptional circumstances, where another registered health practitioner is not able to be nominated by the practitioner, the Board or delegate may consider the nomination of other professionals.

Evidence of the nominated individual's qualifications and experience must also be provided with the nomination including a current CV and registration number.

Nominations for alternate collection arrangements

Requirements for the registrant

Evidence of circumstances that require alternate collection arrangements

The registrant must provide details of their specific circumstances that outlines why alternate collection arrangements should be considered and must be accompanied by evidence. Satisfactory evidence includes but is not limited to certified copies of:

- court orders
- medical certificate from a registered health practitioner confirming health condition of practitioner or dependent immediate family member
- evidence of employment of the practitioner or immediate family member responsible for caring for dependents, including work hours and locations
- correspondence from childcare centre confirming hours of operation and location, and/or
- maps or evidence of journey distances and times.

Written acknowledgements

The registrant must provide with each nomination, using the form provided, confirmation that they:

- are aware of the hours of operation of the nominated collection agent
- are not in a social or familial relationship with the nominated collection agent and are not in a direct employment or contractual arrangement other than fees for collection services of samples for drug screening, and
- authorise Ahpra and the NPP to contact the nominated collection agent to monitor the registrant's compliance with the conditions imposed on their registration
- are aware that if samples are found unsuitable for analysis or positive for substances that the approval of alternate collection arrangements may be revoked.

Requirements for the nominated collection agents

Written acknowledgements

Individuals and/or entities that are nominated as alternate collection agents for the National Pathology Provider must confirm that they:

- are aware of the nomination, consent to the nomination and are willing to act as the collection agent
- not in a social or familial relationship with the registrant and are not in a direct employment or contractual arrangement other than fees for collection services for drug screening
- have read and understood Ahpra's Drug and Alcohol Screening Protocol
- are available as required by the Drug and Alcohol Screening Protocol to undertake testing
 - on a randomised basis for urine drug screening requirements
 - by appointment for hair testing requirements
- agree to use the provided collection tools and receptacles for samples including sample labels as provided by the NPP
- agree to collect, store and transmit all samples in accordance with the training materials provided by the NPP
- agree to notify Ahpra of any change in availability or willingness to undertake collections, and
- are aware that they may be contacted by Ahpra to monitor the registrant's compliance with the conditions imposed on their registration

Details of availability

Nominated collection agents must also provide details of hours of operation or availability.

Supporting evidence

Nominated collection agents that are individuals must supply evidence of their qualifications and/ or experience and registration (if applicable).

Non-compliance with drug screening requirements

All non-compliance with the requirements of the relevant Ahpra protocol must be managed in accordance with Operational Policy: *Managing critical compliance events*.

In addition, any samples received by the NPP that are not suitable for analysis must be reviewed by an Ahpra manager and will trigger a review of alternate collection arrangements. The approval of alternate collection arrangements may be revoked at any time.

Related documents

Restrictions imposed or accepted prior to 16 September 2024: [Ahpra Drug and alcohol screening protocol – November 2015 and updated January 2023](#)

Restrictions imposed or accepted from 16 September 2024: [Ahpra protocol: Screen for drugs](#)

Document control	
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