BY ORDER OF THE COMMANDER, 3RD WING (PACAF)

WING INSTRUCTION 44-103 5 APRIL 2001

Medical



DRUG ABUSE AND BLOOD ALCOHOL TESTING

COMPLIANCE WITH THIS PUBLICATION IS MANDATORY

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OPR: 3 MDSS/SGSC (MSgt A. R. Morrison) Certified by: 3 MDG/CC (Col David D. Gilbreath) Pages: 17 Distribution: F

This instruction implements AFPD 44-1, *Medical Operations*, and provides military and civilian managers, supervisors, and employees guidance for responding to workplace situations that involve suspected substance abuse. It extracts, compiles, and supports information found in the Air Force Civilian Drug Testing Plan, Armed Forces Institute of Pathology Guidelines for the Collection and Shipment of Specimens for Toxicological Analysis, Interim guidance on Modification to Drug Urinalysis Observer Requirements, Memorandum of Agreement between Commander, 3rd Wing Elmendorf AFB, Alaska and Local 1101 American Federation of Government Employees, AFIs 44-120, *Drug Abuse Testing Program*, 44-121, *Alcohol and Drug Abuse Prevention and Treatment (ADAPT) Program*, 91-204, *Safety Investigations and Reports*, AFPAM 36-2241, *Promotion Fitness Examination (PFE) Study Guide*. It also furnishes information on how and when to request blood alcohol and drug abuse testing. It applies to all active duty and DoD civilians assigned to Elmendorf AFB. This publication does not apply to Air National Guard and Air Force Reserve units and members.

This instruction requires collecting and maintaining information protected by the Privacy Act of 1974 authorized by 42 U.S.C. 290dd-2 and E.O. 9397 (SSN). Privacy Act System of Records Notice F044 AF SG - Alcohol and Drug Abuse Prevention and Treatment Program (December 23, 1999, 64 FR 72072) applies.

1. Substance Abuse (SA) Policy. SA control policies and programs are thoroughly integrated into every facet of the Air Force quality force management. The policies have been in place for over two decades and have evolved to meet changing conditions within the Air Force. The Air Force's policy on SA (attachment 1) is clear: *SA is incompatible with the maintenance of high standards required of Air Force personnel and will not be tolerated*. Our members are held to the highest standards of discipline and behavior, both on and off duty. Individuals who do experience problems related to SA will receive counseling and treatment as needed; however, all Air Force members and DoD employees are accountable for their actions. The primary objective of the substance abuse program is to return all identified substance abusers to unlimited duty status or to assist them in their transition to other employment endeavors.

2. Managers and Supervisor's Role. The Air Force's objective regarding SA runs parallel with your responsibilities as a manager and represents an affirmative step in its efforts to show genuine, personal concern for the welfare of its members. As an Air Force leader, you are not tasked to be a diagnostician or a treatment professional. However, as a manager, you are challenged to identify and confront unacceptable performance or behavior, whatever the cause, and on that basis to take timely and appropriate action. It's important to note when SA presents itself that's the time to confront it. Ignoring the problem in hopes that it will go away will only make the problem worse for the individual involved, the organization, and ultimately the Air Force.

3. Military Test Categories:

- 3.1. Consent:
 - 3.1.1. Testing of a member who has voluntarily agreed to provide a sample.
 - 3.1.2. Consent must be given voluntarily without coercion, threats, or bribes.
- 3.2. Probable Cause:

3.2.1. Testing based on a reasonable belief that an illegal drug or illegal drug metabolite will be present in the member's urine or to determine an individual's level of alcohol intoxication.

3.2.2. Requires search authorization from the wing commander or military magistrate.

3.2.3. Results can be used as evidence to support Article 15 or court-martial actions or to determine service characterization in administrative discharges.

3.3. Commander Directed:

3.3.1. Testing for suspected substance abuse based on abnormal behavior or where the commander suspects drugs or alcohol may be present but probable cause does not exist.

3.3.2. Results from commander directed testing could not be used as evidence to support Article 15, court-martial actions, or to determine service characterization in administrative discharges.

3.4. Random Drug Testing:

3.4.1. Random drug testing is an inspection to ensure good order and discipline.

3.4.2. Members are ordered to report to the designated collection site within 2 hours of notification.

3.4.3. Failure to provide a specimen could be grounds for disciplinary action.

3.5. Unit Sweeps:

3.5.1. Used to administer drug testing upon all personnel assigned to a specified organization.

3.5.2. Testing is conducted at the request of the organization's commander or designee.

3.6. Safety Mishaps:

3.6.1. SQ/GRP/WG CCs or higher must authorize toxicology (TOX) testing if alcohol intoxication or drug use is suspected. Consult with the Staff Judge Advocate (SJA) prior to requesting or authorizing TOX testing. 3.6.2. For Class A or B Aircraft and unmanned aerial vehicle (UAV) mishaps, test involved flight crews and UAV controllers.

3.6.3. For Class A, B, and C Mishaps, test individuals whose actions or inaction, in the commander's judgment, may have been factors in the Class A or B mishap sequence.

3.6.4. For aircraft physiological mishaps, test those individuals exhibiting physiological symptoms.

4. Military Drug Testing Program:

4.1. After coordination with the SJA, unit commanders will direct drug testing within 24 hours of suspected alcohol related incidents of misconduct, episodes of aberrant behavior, or where there is reasonable suspicion of drug use and the member refuses to provide consent for testing. Commanders are also encouraged to ensure blood alcohol testing (BAT) specimens are collected as soon after the incident as possible to determine the level and intensity of alcohol involvement.

4.2. Collection points and hours of operation:

4.2.1. Primary collection point: Drug Demand Reduction (DDR) Office, Building 10-437.

4.2.2. Hours of operation: Monday, Tuesday, Wednesday, Friday 0800-1100 and 1430-1530 hours. **NOTE:** Testing on Thursdays is only available from 0800-1100 due to afternoon staff meetings and training.

4.2.3. Alternate and after-hours collection site:

4.2.3.1. 3 MDSS/SGSC, Laboratory Flight, 1st floor, 5955 Zeamer Ave.

4.2.3.2. Individuals sent to the lab for drug UA collections must have the following:

4.2.3.2.1. Someone designated as an observer.

4.2.3.2.1.1. Designated observers must meet the criteria outlined in paragraph 4.3.8, this instruction.

4.2.3.2.2. Documentation requesting the drug testing and his or her military ID. **NOTE:** Specimens will still be collected from individuals even if the documentation requesting testing is unavailable at the time of the collection. The documentation requesting testing should be forwarded to the laboratory flight or DDR Office as soon as possible.

4.2.4. Unit sweeps are performed at designated locations.

4.3. Urinalysis drug testing procedures: **NOTE:** Consult with the SJA before requesting drug testing under the categories of consent, commander directed, probable cause, or unit sweeps

4.3.1. Consent Testing:

4.3.1.1. Unit commander, first sergeant, or designated official may request an individual to voluntarily consent to drug testing.

4.3.1.2. The request must be performed in the presence of one or more witnesses.

4.3.1.3. Consent must be given without coercion.

4.3.1.4. If the suspected individual consents to provide a urine specimen then:

4.3.1.4.1. Complete AF Form 1364, *Consent for Search and Seizure*. The consent form must inform the member that the search is for illegal drug use.

4.3.1.4.2. Indicate on the form that a "urine specimen" is required for testing. Have the member bring the AF Form 1364 when they report to the collection site.

4.3.1.5. Have the member escorted to the collection site. The escort may act as the observer if he or she is of the same gender and meets the requirements outlined in paragraph 4.3.8, this instruction.

4.3.2. Probable Cause Testing:

4.3.2.1. Testing based on reasonable belief that illegal drug or drug metabolite will be present in the member's urine.

4.3.2.2. Authorization to collect a drug testing specimen under probable cause must come from the wing commander, military magistrate, or their designees.

4.3.2.3. If authorization is granted, have the individual escorted to the collection site along with a letter requesting probable cause testing (attachment 2) and his or her military identification (ID). The escort may act as the observer if he or she is of the same gender and meets the requirements outlined in paragraph 4.3.8, this instruction.

4.3.3. Commander Directed:

4.3.3.1. Must have a reasonable suspicion that an individual is involved in illegal drug use.

4.3.3.2. Have the individual escorted to the collection point along with the letter-requesting commander directed testing (attachment 2) and his or her military ID. The escort may act as the observer if he or she is of the same gender and meets the requirements outlined in paragraph 4.3.8, this instruction.

4.3.4. Unit Sweeps (only the unit commander may authorize a unit sweep):

4.3.4.1. All personnel assigned or selected must be tested.

4.3.4.2. Positive drug testing results obtained from a unit sweep may be used to refer a member for SA evaluation, as evidence in a disciplinary action under the Uniform Code of Military Justice (UCMJ), or as evidence in administrative discharge proceedings.

4.3.4.3. Deciding officials and anyone who has prior knowledge of the projected sweep must report, within 2 hours of the decision or notification of the decision, to the DDR Office and provide a drug UA sample.

4.3.5. Types of Sweeps:

4.3.5.1. Full unit sweep.

4.3.5.2. Partial unit sweep:

4.3.5.2.1. A commander decides that only part of the unit should be tested.

4.3.5.2.2. The selection process must be approved by SJA for legal sufficiency.

- 4.3.6. Inspection testing that consists of random testing or unit sweeps.
- 4.3.7. Observer Detail:

4.3.7.1. First sergeants assigned to the 3rd Wing and its tenant units will establish a schedule that provides observers for each week throughout the calendar year. A minimum of **three** observers per week (2 male and 1 female) is required. **NOTE:** Additional observers may be required during a unit sweep.

4.3.7.2. Observer duties are performed between 0800-1100 and 1430-1530, Mon, Tue, Wed, and Fridays. Collections are performed from 0800-1100 on Thursdays due to DDR training requirements.

4.3.7.2.1. Observers will either come from the unit tasked with providing observers, for that week, or from the organization being sweep tested.

4.3.7.2.2. Designated observers, from the organization being sweep tested, must provide a urine specimen on the day prior to the sweep.

4.3.8. Observer Requirements:

4.3.8.1. Must be of the same sex as the member being observed and must not be scheduled to provide a sample on the same day they are to observe specimen collections.

4.3.8.2. May not be an observer if they have an unfavorable information file, or if an action under the UCMJ or an adverse administration action is pending against them.

4.3.8.3. May not be an observer if they have ever been convicted by court-martial or civilian court, received non-judicial punishment under Article 15, UCMJ, or received a letter of reprimand or similar administrative action for misconduct involving dishonesty (such as a false official statement), fraud, or drug abuse (including possession or distribution).

4.3.8.4. May not be an observer if they are within 6 months of either separation or retirement from active duty.

4.3.8.4.1. Air National Guard and Air Force Reserve members may not be an observer if they are within 1 year of either separation or transfer from and active participation status.

4.3.8.5. May not be an observer if they are on a medical profile that will prevent them from performing their assigned duties as an observer.

4.3.8.6. Must observe the member receiving the empty specimen bottle from the drug testing monitor and they must enter the rest room with the member. They must direct the member to wash his/her hands with only water then dry them prior to providing a specimen. They must observe the member urinating directly into the labeled specimen bottle and capping it. If a female chooses to use the optional wide mouth sterile collection cup, they must directly observe the member providing the specimen, pouring the urine into the labeled specimen bottle and capping it. As an observer, they are required by AFI 44-120 to ensure the specimen provided is not contaminated or altered in any way.

4.3.8.7. Must stay with the member until ready to exit the bathroom. Neither the member nor the specimen bottle can be out of their sight at any time. They must observe the member carry the specimen bottle out of the bathroom and hand it to the drug testing monitor. They will observe the member initial and date the specimen bottle label. They will then initial and date the bottle label. **NOTE: DO NOT HANDLE THE SAMPLE AT ANY TIME UNTIL IT'S TIME TO INITIAL THE LABEL.**

4.3.8.8. Must print their name where designated in the ledger. Initial and sign their payroll signature next to the member's entry.

4.3.8.9. Must observe the drug testing monitor apply the tamper-proof tape to the bottle and print and sign their name and initials on the log.

4.3.9. Drug Testing Roster and Access:

4.3.9.1. Map a network driver to the **3mdg-webserver/uatest** to access your unit's roster.

4.3.9.2. Only trusted agents (TA), assigned in writing, will be able to access this information.

4.3.9.3. Rosters will have the names of members selected for inspection testing.

4.3.9.4. Contact the DDR Office if you have problems, need information on how to map the network drive, or download the information.

4.3.9.5. Roster data is available by 0730 each day of testing.

4.3.9.6. The DDR Office will fax the roster information if the trusted agent cannot gain access to the file-sharing folder.

4.3.10. Unit Commanders (Or Designee) Should Ensure The Following:

4.3.10.1. Observers are provided to the DDR Office on days specified.

4.3.10.2. Appoint individuals to act as TAs.

4.3.10.3. Take appropriate administrative or UCMJ actions against personnel who fail to attend testing without a valid reason such as temporary duty (TDY), leave, permanent change of station (PCS), and so forth.

4.3.10.4. Individuals are retested if their previously submitted specimens were determined to be untestable, not consistent with human urine, adulterated, or diluted.

4.3.10.5. Selected individuals will report for specimen collection within 2 hours of notification.

4.3.10.6. Immediately notifies personnel, who were selected for drug UA testing, after they return from crew rest, leave, TDY, or were unavailable due to mission requirements.

4.3.11. TAs Should Ensure The Following:

4.3.11.1. Download the names of personnel selected for random inspection.

4.3.11.2. Prepare random inspection notification letters (attachment 2).

4.3.11.3. Contact all personnel who are available for testing between 0600-0900 or 1230-1330.

4.3.11.4. Have personnel read and acknowledge receipt of the random inspection notification letter.

4.3.11.5. Informs personnel to report to the designated collection site, with his or her military ID card, within 2 hours after notification.

4.3.11.6. Inform the commander or first sergeant of all individuals unavailable for testing.

4.3.11.7. Prepares a no-contact letter that includes the name of personnel not contacted, the

reason why, and the individual's expected date of return. Sends the letter to the DDR Office via fax or file sharing by 1100.

4.3.11.8. Collect the notification letter after the individual has supplied a urine sample and the urine collection official has signed the letter.

4.3.11.9. Maintain the notification letters for 120 days or longer in the individuals personnel information file (PIF).

4.3.12. Specimen Collection and Shipping:

4.3.12.1. Specimen collection and shipping procedures are performed in accordance with AFI 44-120 and local operating instructions.

4.3.12.2. Results normally take approximately 14-21 days.

4.3.13. Positive Urinalysis Result Notifications:

4.3.13.1. After receiving a positive result message, the DDR Office will confirm the sample number and social security number on the positive notification message matches the information found in the DDR Office or laboratory ledger.

4.3.13.1.1. The DDR Office will prepare a letter stating the following:

4.3.13.1.1.1. Name of the individual who tested positive.

4.3.13.1.1.2. Sample collection date.

4.3.13.1.1.3. Observer's name.

4.3.13.1.1.4. Category of testing.

4.3.13.1.1.5. Collection official.

4.3.13.1.1.6. Drug identified.

4.3.13.1.2. The DDR Office will forward copies of the letter to the medical review officer (MRO), office of special investigation (OSI), SJA, unit commander, and Alcohol and Drug Abuse and Treatment (ADAPT). The original will be kept on file in the DDR Office.

4.3.13.1.3. The MRO must determine whether prescribed medication or other natural or synthetic substances, to which the member has been exposed, could have caused the member's positive drug test. The MRO will review the member's medical and dental records as well as any other documents deemed appropriate in assessing a positive test result.

5. Civilian Drug Testing Program. Drug testing of civilian employees will be done in accordance with the current Memorandum of Agreement between Commander, 3rd Wing Elmendorf Air Force Base, Alaska and Local 1101 American Federation of Government Employees and the Air Force Civilian Drug Testing Plan.

6. Whole Blood Alcohol Testing (BAT) of Military Personnel:

6.1. After coordination with the SJA, unit commanders will direct drug testing within 24 hours of suspected alcohol related incidents of misconduct, episodes of aberrant behavior, or where there is reasonable suspicion of drug use and the member refuses to provide consent for testing. Commanders are also encouraged to ensure BAT are taken as soon after the incident as possible to determine the level and intensity of alcohol involvement.

6.2. Results obtained from breathalyzers performed by SFS or eyewitness testimony can usually supply enough evidence to establish alcohol intoxication.

6.3. Consult with the SJA before requesting BAT tests. Use attachment 3 as a guide to document the individual's behavior.

6.4. BAT Testing Categories:

6.4.1. Consent Testing:

6.4.1.1. Unit commander, first sergeant, or designated official may request an individual to consent to BAT testing.

6.4.1.2. The request must be performed in the presence of one or more witnesses.

6.4.1.3. Consent must be given voluntarily and without coercion.

6.4.1.4. If the suspected individual consents to provide a blood specimen:

6.4.1.4.1. Complete AF Form 1364. The consent form must inform the member that the search is for BAT.

6.4.1.4.2. Indicate on the AF Form 1364 that a blood specimen is required for testing.

6.4.1.5. Have the member escorted to the 3 MDG laboratory. The member must have the completed AF Form 1364 with them when reporting to the laboratory.

6.5. Probable Cause (Non-Consensual Drawing of Blood):

6.5.1. The wing commander, wing commander's designee, or military magistrate may grant authorization for BAT testing (attachment 4).

6.5.2. The decision to proceed with a nonconsensual drawing of blood should be made after consultation with the SJA.

6.6. Procedure:

6.6.1. Individuals requiring BAT testing will be brought to the 3 MDG laboratory along with the documentation requesting the BAT testing. **NOTE:** Specimens will still be collected from individuals even if the documentation requesting testing is unavailable at the time of the collection. The documentation requesting testing should be forwarded to the clinical laboratory as soon as possible.

6.6.2. Laboratory personnel will collect and ship specimens to the Armed Forces Institute of Pathology (AFIP) for testing.

6.6.3. Test results will be received by the laboratory and forwarded to the 3 MDG Release of Information Office.

6.7. Patients who refuse to provide a specimen for BAT testing:

6.7.1. If the patient refuses to cooperate, contact the SJA.

6.7.1.1. If search authorization is obtained from the military magistrate, the suspect should be informed that:

6.7.1.1.1. The order is from a military magistrate.

6.7.1.1.2. The military member must comply with the order or face additional disciplinary action.

6.7.1.1.3. The use of force may be used if the military member continues to refuse. Have the member restrained by SFS personnel and the blood drawn by a laboratory technician if the member continues to refuse. **NOTE:** The use of force to restrain an individual, for the purposes of obtaining a blood specimen, should only be done after consultation with the SJA.

7. BAT of DoD Civilian Employees. BAT testing of civilian employees will be done in accordance with the current Memorandum of Agreement between Commander, 3rd Wing Elmendorf Air Force Base, Alaska and Local 1101 American Federation of Government Employees.

8. TOX Testing of Military Personnel Involved in Class A, B, C or Nuclear Mishaps:

8.1. The 3rd Wing Safety Office will determine the mishap category.

8.2. The investigating safety officer or flight surgeon will send individual(s) who require TOX testing, to the 3 MDG laboratory for specimen collection. The investigating safety officer should request TOX testing by letter (attachment 5). **NOTE:** Specimens will still be collected from individuals even if the documentation requesting testing is unavailable at the time of the collection. The documentation requesting testing should be forwarded to the clinical laboratory as soon as possible.

8.3. Laboratory personnel will collect and ship the specimens to the AFIP for testing. The laboratory will receive and forward the results to the 3 MDG Release of Information Office.

9. Drug Testing of Civilian Personnel Involved in Class A , B, C or Nuclear Mishaps. Drug testing of civilian employees shall be done in accordance with the current Memorandum of Agreement between Commander, 3rd Wing Elmendorf Air Force Base, Alaska and Local 1101 American Federation of Government Employees and the Civilian Drug Testing Plan.

DOUGLAS M. FRASER, Colonel, USAF Commander

TERMS EXPLAINED

Terms

ADAPT--Alcohol and Drug Abuse and Treatment

AFIP--Armed Forces Institute of Pathology

BAT--Blood Alcohol Testing

CPF--Civilian Personnel Flight

DDR--Drug Demand Reduction

DDRC--Drug Demand Reduction Coordinator

Drug UA--Drug Urinalysis

Military ID Card--DD Form 2, Armed Forces of the United States ID card

MRO--Medical Review Officer

OI--Operational Instruction

OSI--Office of Special Investigation

PCS--Permanent Change of Station

PFE--Promotion Fitness Examination

PIF--Personnel Information File

SA--Substance Abuse

SFS--Security Forces Squadron

SJA--Staff Judge Advocate

TDY--Temporary Duty

TOX--Toxicology

UCMJ--Uniformed Code of Military Justice

UIF--Unfavorable Information File

SAMPLE NOTIFICATION MEMORANDUM FOR MILITARY DRUG TESTING

MEMORANDUM FOR: _____

Date:_____

FROM: _____ Military Magistrate

_____ Commander

SUBJECT: Order to provide a specimen for drug urinalysis testing

1. You are directed to report immediately to the Drug Demand Reduction Office, Bldg. 10-437, Room. 228, Elmendorf AFB, Alaska. The authority for this mandatory appointment is AFI 44-120. One of the following test categories apply:

a. _____ Commander Directed (CD)

b. _____ Probable Cause (PC)

c. _____ Random Inspection Testing (IO)

d. _____ Remarks: _____

2. Surrender your DD form 2AF (military ID) upon arrival at the testing location. Remain there until a specimen is provided and you are released.

3. You will be observed urinating directly into the bottle or other receptacle provided. Avoid contaminating the specimen and fill the bottle with a minimum of 30 milliliters of urine.

4. Return this letter to the orderly room after providing a specimen for drug testing.

(Authorizing Official's Signature Block)

1st Ind., (Name/rank of individual)

TO: (Unit commander's support staff)

Receipt Acknowledged: (Time) on (Date)

(Individual's Signature)

2nd Ind., 3 MDG

TO: Drug Demand Reduction office (SGOH) or Hospital Laboratory Services (SGSC).

A urine specimen was collected from the individual listed above at (<u>Time</u>) on (<u>Date</u>)

(Drug UA Collection Official's Signature)

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SAMPLE SUSPECTED ALCOHOL OR DRUG ABUSER OBSERVATIONS MEMO

<u>Date)</u>

MEMORANDUM FOR WHOM IT MAY CONCERN

FROM: (Name and Office Symbol)

SUBJECT: Suspected alcohol or drug abuse observation memo.

- 1. (Name of Individual and organization assigned)
- 2. (Location of incident, date, and time)
- 3. (Individual reporting the incident and organization assigned)
- 4. (Names of witnesses)
- 5. (Brief description of the incident)
- 6. (Supporting information)
 - a. Suspected of alcohol or drug abuse.
 - b. Odor of alcohol.
 - c. Speech (that is, slurred, incoherent).
 - d. Balance (that is, falls, requires support, wobbling, swaying).
 - e. Walking (that is, staggering, stumbling).
 - f. Behavior (that is, argumentative, combative).
 - g. Physical Appearance (that is, reddish eyes, tremors, vomiting)
 - h. Additional supporting information.

- 7. (Supervisor's signature, date, and time)
- 8. (Witnesses signatures, date and time)

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SAMPLE AF ACTIVE DUTY MEMBER PROBABLE CAUSE MEMORANDUM

(Date)

MEMORANDUM FOR (Name and SSN)

FROM: (Wing commander, military magistrate. or their designees)

SUBJECT: Notification of Blood Alcohol Testing

1. This is to inform you that you are suspected of alcohol substance abuse based upon a reasonable suspicion. This determination of reasonable suspicion is based upon <u>(briefly state the circumstances underly-ing the decision to test for example: smelling of alcohol)</u>.

2. Report to the 3rd Medical Group laboratory (580-6561) on (date) and (time) for blood collection. Surrender your military ID upon arrival and remain there until your specimen(s) are collected.

3. Have the laboratory technician sign and date when the collection occurred.

4. Letter signed by Wing Commander, Legal Magistrate or Appointed Designee.

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SAMPLE SAFETY MISHAP NOTIFICATION MEMORANDUM

(Date)

MEMORANDUM FOR: (Name/Rank) (SSAN)

FROM: Safety Investigation Board President

SUBJECT: Order to provide specimens for toxicology testing

1. You are directed to provide a urine and blood specimen for the purpose of toxicology testing due to your involvement in the mishap listed below. The authority for this request is listed in AFI 91-204:

a. Brief description of mishap:

2. Bring this letter and your military ID (or some other picture ID) to the 3rd Medical Group Clinical Laboratory, first floor, 5955 Zeamer Av, Elmendorf AFB, AK.

3. You must report to the laboratory within 2 hours of this notification.

(Safety Investigation Board President Name/Rank)

(Board President's Signature)

1st Ind., Individual being tested

I acknowledge receipt on (Date), at (Time) hours.

(Member's Signature)

2nd Ind., 3 MDG

TO: Laboratory Fight (SGSC)

A urine/blood specimen was collected at (<u>Time</u>) on (<u>Date</u>)

(Laboratory collection official's signature)

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