



Medical Review Officer Reminder 49 CFR Part 40 Changes Effective October 1, 2010

We want to remind MROs to study the new rule and to pay special attention to sections in the preamble and rule text related to new MRO responsibilities regarding drug test results review and record keeping, in addition to the new MRO requalification training requirements.

About MRO requalification training, the preamble states:

“This regulation text lays out the requirements for when this new requalification training is to take place. MROs must maintain documentation about their qualification training and any subsequent continuing education. MROs would simply be required to complete the new requalification training and examination no later than five years from the date of having last met either their qualification training or continuing education requirements. Following the completion of the new requalification requirements, MROs will be required to complete requalification training and examination every five years thereafter.”

Three Examples for Current MROs:

1. If an MRO completed qualification training & passed an examination March 4, 2009, under the old rule, that MRO would need to complete the requalification training and pass an examination by March 4, 2014, under the new rule.
2. If an MRO completed qualification training & passed an examination August 16, 2007, and completed the required 12 hours of Continuing Education and assessment during the subsequent three years (by August 16, 2010) under the old rule, that MRO would need to complete the requalification training and pass an examination by August 16, 2015, under the new rule.
3. If an MRO completed qualification training & passed an examination November 3, 2007, and has not yet completed Continuing Education and assessment under the old rule, that MRO would need to complete the requalification training and pass an examination by November 3, 2012, under the new rule.

One Example for New MROs:

1. You must complete qualification training & pass an examination before you begin serving as an MRO, and 5 years afterward you will need to complete requalification training & pass an examination. Therefore, if a new MRO would complete qualification training & pass an examination on October 19, 2010, that MRO would need to complete the requalification training and pass an examination by October 19, 2015.

The new rule can be found at: <http://edocket.access.gpo.gov/2010/pdf/2010-20095.pdf> .

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