

BOARD OF EDUCATION ENCLOSURE

Award Recommendation — DOT Drug & Alcohol Testing Services

RFP No. OCBE-TRANS-2026 DOT DRUG/ALCOHOL TESTING

Enclosure Summary	
Prepared By:	James Stewart, Director of Transportation
Submitted To:	Board of Education, Oldham County Schools
Date:	June 2026
RFP Number:	OCBE-TRANS-2026 DOT DRUG/ALCOHOL TESTING
Bid Opening:	May 29, 2026 @ 11:00 A.M. EST
Proposals Received:	1 (MC Consultant Services Inc.)
Recommended Vendor:	MC Consultant Services Inc., Louisville, KY
Recommended Term:	1-Year Contract (Vendor Proposed: 3-Year with up to 3 Renewal Options)
Est. Annual Cost:	Approximately \$4,500 (minimum FMCSA testing rates)
Regulatory Authority:	49 CFR Parts 382 & 40; KRS 156.153; 702 KAR 5:130

Background and Purpose

The Oldham County Board of Education Transportation Department is required by federal and state law to maintain a DOT-compliant drug and alcohol testing program for all CDL bus drivers and a separate testing program for non-CDL school bus passenger vehicle (NSBPV) drivers. Specifically:

- 49 CFR Part 382 requires all CDL-holding commercial motor vehicle operators to participate in a random drug and alcohol testing program administered by a qualified Consortium/Third-Party Administrator (C/TPA) registered with the FMCSA Drug & Alcohol Clearinghouse.
- KRS 156.153(3)(d)(3) and 702 KAR 5:130, Section 6(1) require that non-CDL drivers operating NSBPVs to transport pupils be subject to a parallel, separately administered testing pool following 49 CFR Part 40 procedures, with results tracked independently from the DOT/CDL pool.

C/TPA drug and alcohol testing services are professional services and are not subject to mandatory competitive bidding under KRS 45A or 702 KAR 3:135. However, the Board elected to conduct a competitive Request for Proposals process in the best interest of the district’s fiscal stewardship and to ensure the most qualified vendor is engaged for this safety-critical function. The district has been utilizing its current provider for drug and alcohol testing services without a formal written contract. The current provider does not provide on-site collection services, and its collection facility is not accessible to commercial school buses, requiring drivers selected for testing to change vehicles prior to reporting to the collection site. Additionally, the Transportation Department identified serious concerns regarding the integrity of the current provider’s random testing program, which are documented in the Current Provider Concerns section below. RFP No. OCBE-TRANS-2026 DOT DRUG/ALCOHOL TESTING was developed to identify a qualified vendor capable of administering both the CDL and non-CDL pools with on-site collection at the district’s transportation facility and full regulatory compliance.

Current Provider Concerns

The Transportation Department identified the following deficiencies with the district’s current arrangement with its current provider that formed part of the basis for initiating this procurement. These concerns are documented for the record and to inform the Board’s award decision.

1. No Formal Written Contract

The district has utilized its current provider for drug and alcohol testing services without a formal written contract in place. This arrangement exposes the district to significant risk with respect to service terms, pricing, liability, regulatory responsibility, and vendor accountability.

2. No On-Site Collection Capability

The current provider does not offer on-site specimen collection at the district’s transportation facility. Their collection site is not accessible to commercial school buses, requiring each driver selected for testing to change from a school bus to a personal or district vehicle before traveling to the collection location. This vehicle change introduces unnecessary operational disruption, extends drivers’ time away from their duties, and may compromise the integrity of the chain of custody timeline by adding unmonitored transit time between selection and collection.

3. Critical Random Testing Integrity Concern — Advance Notice of Test Dates Provided to DER

This is the most significant concern and a potential regulatory violation under 49 CFR Part 382. On May 28, 2026, the current provider sent the following email to the district’s Designated Employer Representative (DER):

From: [Current Provider Representative] <[redacted]> | **Sent:** Thursday, May 28, 2026 8:11 PM
To: Pierce, Sheila <sheila.pierce@oldham.kyschools.us>; BHMG OccMed LaGrange (BHS)
Subject: JUNE DOT Randoms

Hi Sheila,

Please see the available dates for your random drug screenings in June:

- June 9, 10, or 11
- June 16 or 18
- June 23 or 26

Please let me know which date works best for you, or if you need an alternative option.
 [Current Provider Representative]

This email demonstrates that the current provider was soliciting the DER’s input on which dates to schedule the “random” drug screenings — a practice that is a direct and material violation of 49 CFR §382.305(b)(1), which requires that random selections be made by a scientifically valid method and that the dates, times, and individuals selected remain unannounced. Allowing the employer’s DER to select or confirm the testing dates defeats the fundamental purpose of random testing, which is to deter drug and alcohol use through unpredictability. Under 49 CFR §382.305(i)(3), notification and collection must occur within the same selection period, and the DER is required to forward the results — not negotiate the schedule. The Transportation Department has retained this email as documentation of this deficiency. The Board should be aware that any testing conducted under this arrangement may not be defensible as compliant random testing under federal law.

Procurement Process

While not required to do so, the district issued this RFP through a formal competitive solicitation process to promote fiscal responsibility and vendor accountability. The RFP was developed internally by the Transportation Department Director and publicly advertised. Key milestones of the process are summarized below.

Milestone	Detail
RFP Development	Prepared by Transportation Director; included compliance certification checklist (Sec. 5), on-site collection requirement, and non-CDL pool specifications

Advertisement	Publicly advertised (voluntary competitive process; professional services are exempt from mandatory bidding under KRS 45A)
Bid Opening	May 29, 2026 @ 11:00 A.M. EST
Proposals Received	1 (one) — MC Consultant Services Inc.
Evaluation Completed	June 2026
Board Action Requested	June 2026 Regular Board Meeting

One proposal was received in response to this RFP. Because C/TPA services qualify as professional services under Kentucky procurement law, the district was not required to bid competitively; the RFP was issued voluntarily to promote fiscal responsibility and competitive accountability. MC Consultant Services Inc. is a well-established and reputable provider with 24 years of continuous DOT drug and alcohol testing experience for Kentucky school districts, currently serving 18 school systems in the Commonwealth.

Vendor Qualifications — MC Consultant Services Inc.

Qualification Factor	Summary
Years in Business	24 years — continuous DOT drug & alcohol testing since firm's founding
School District Experience	18 Kentucky school districts currently served as FMCSA compliance consultant and C/TPA
FMCSA Clearinghouse Status	Registered as C/TPA in FMCSA Drug & Alcohol Clearinghouse (verified)
MRO Credentials	Janelle Jaworski, M.D. — MROCC Certified through August 17, 2027
Laboratory Partners	CDL pool: CRL (Lenexa, KS) — SAMHSA approved. Non-CDL pool: Alere Toxicology Services (Abbott Industries, Gretna, LA) — SAMHSA approved
Random Selection System	"Intelligent Documents" software — scientifically valid per §382.305(i)(1); separate CDL and non-CDL pools
On-Site Collection	Standard (non-optional) — qualified collectors deployed to 1800 Button Lane, LaGrange, KY 40031
Alternate Network Location	8003 Blue Lick Rd., Louisville, KY 40219 — open Mon–Fri 8:00 a.m. to 5:00 p.m.; 24/7 availability for post-accident
Alcohol Testing Equipment	Intoxilyzer 900 (CMI Inc.) — BAT trained per 49 CFR Part 40.213
References	7 Kentucky school districts provided, including Warren County, Franklin County, Spencer County, Christian County, Owen County, Grant County, and Shelby County Schools

Pricing Summary (RFP Section 4.4)

MC Consultant Services Inc. submitted a complete and transparent fee schedule. All enrollment, administration, and on-site collection fees are waived (charged at \$0). Costs to the district are incurred only when tests are actually conducted.

Service	Unit	Fee
CDL/DOT Pool (49 CFR Parts 382 & 40)		
Annual enrollment fee	Per driver/year	\$0
Random selection administration	Per quarter	\$0
DOT urine drug test (collection + lab + MRO)	Per test	\$50

DOT breath alcohol test	Per test	\$30
On-site collection at 1800 Button Lane	Per visit	\$0
Post-accident test coordination (24/7)	Per event	\$50
Clearinghouse violation reporting	Per report	\$0
Supervisor reasonable suspicion training	Per person	\$150/class
DER training/orientation	Per session	\$150
Return-to-duty test coordination	Per event	\$75
Follow-up test coordination	Per test	\$15
Non-CDL NSBPV Pool (KRS 156.153 / 702 KAR 5:130)		
Annual enrollment fee	Per driver/year	\$0
Non-CDL urine drug test (collection + lab + MRO)	Per test	\$50
Non-CDL breath alcohol test	Per test	\$30
Return-to-service test coordination	Per event	\$50
Estimated Annual District Cost Summary		
CDL pool (~80 drivers, min. testing rates)	Annual	~\$4,000
Non-CDL pool (~25 drivers, min. testing rates)	Annual	~\$500
Combined Estimated Annual Cost (random testing only)	Annual	~\$4,500

Note: Enrollment and administration fees are \$0. Actual costs will vary based on the number of drivers selected and test type mix. On-site collection is included at no additional charge. Estimates assume FMCSA minimum rates of 50% drug testing and 10% alcohol testing annually.

Compliance Certification Summary (RFP Section 5)

MC Consultant Services Inc. executed and returned the signed compliance certification table (Section 5 of the RFP). The vendor certified "Yes" to all 28 compliance items, including requirements specific to the non-CDL/NSBPV driver pool under KRS 156.153 and 702 KAR 5:130. Key certifications include:

- Scientifically valid random selection methodology (§382.305(i)(1)) using the "Intelligent Documents" software platform, with CDL and non-CDL pools maintained separately.
- All random testing performed on-site at the District Transportation Facility at 1800 Button Lane, LaGrange, KY 40031, with collection at no cost to the district per visit.
- 24/7 availability for post-accident and reasonable suspicion testing; alternate network location at 8003 Blue Lick Rd., Louisville, KY available for walk-in testing.
- Non-CDL pool tested at minimum 50% (drug) and 10% (alcohol) of average positions annually, with results tracked separately and not reported to the FMCSA Clearinghouse.
- Annual MIS reporting to the district each January per §382.403; Clearinghouse reporting per §382.705.
- SAMHSA-certified laboratories, qualified DOT collectors, and certified MRO (Janelle Jaworski, M.D., MROCC certified through August 17, 2027).

Director's Recommendation

The Director of Transportation recommends that the Board of Education approve the award of RFP No. OCBE-TRANS-2026 DOT DRUG/ALCOHOL TESTING to **MC Consultant Services Inc.** of Louisville, Kentucky, for an initial one (1) year term, with the option to renew for additional one-year periods if performance meets district expectations, at the unit prices submitted in the vendor's proposal. While MC Consultant Services Inc. proposed a three (3) year contract with up to three (3) renewal options, the Director

recommends an initial one-year term to allow the district to evaluate vendor performance before committing to a longer arrangement.

This recommendation is based on the following findings:

- MC Consultant Services Inc. is the sole responsive and responsible bidder, having submitted a complete, signed proposal that addresses all RFP requirements. While only one proposal was received, the competitive RFP process was voluntary; the district was not required to bid these professional services under KRS 45A.
- The vendor certified compliance with all 28 compliance items in Section 5 of the RFP, including both CDL/DOT and non-CDL/NSBPV regulatory requirements.
- On-site collection at 1800 Button Lane is included as a standard, non-optional program component at no additional cost — a critical operational requirement of the RFP.
- The vendor's 24-year track record serving 18 Kentucky school districts, combined with FMCSA Clearinghouse registration and a currently certified MRO, demonstrates the qualifications and experience necessary to administer this program.
- The unit pricing is reasonable and the estimated annual cost of approximately \$4,500 for minimum required testing across both pools represents strong value for a fully managed, on-site program.
- All enrollment, administrative, and on-site collection fees are waived; the district incurs cost only for actual tests conducted.
- The current provider operates without a formal written contract, does not offer on-site collection, maintains a facility inaccessible to school buses, and the Transportation Department has documented evidence that testing dates were communicated to the DER in advance — a material violation of the unannounced requirement under 49 CFR §382.305. Award to MC Consultant Services Inc. corrects all of these deficiencies simultaneously.

Recommended Board Motion

MOTION:

I move that the Oldham County Board of Education approve the award of RFP No. OCBE-TRANS-2026 DOT DRUG/ALCOHOL TESTING to MC Consultant Services Inc. (Louisville, Kentucky) for an initial one (1) year term, with the option to renew for additional one-year periods based on satisfactory performance, at the unit prices submitted in the vendor's proposal, pursuant to the Transportation Department Director's recommendation.