



**DEPARTMENT OF THE AIR FORCE**  
**WASHINGTON, DC**

Office of the Secretary

April 24, 2013

SAF/LL  
1160 Air Force Pentagon  
Washington, DC 20330

The Honorable Bill Nelson  
United States Senator  
225 East Robinson Street, Suite 410  
Orlando, FL 32801

Dear Senator Nelson:

This is in reply to your inquiry on behalf of Mr. Alan C. Cooper regarding civilian positions inappropriately designated as Testing Designated Positions (TDPs).

Officials at Eglin AFB advise Air Force Instruction (AFI) 44-107 implemented the requirement for civilian pre-employment drug testing and the random drug testing of employees serving in TDPs. The new AFI expanded the breadth of the Drug Demand Reduction Program to include more positions covered as TDPs. With the implementation of the AFI, there was a requirement that all positions which were coded as Security Access Requirement (SAR) code 7 (Secret) be designated as TDPs. In addition, all positions with driving duties were designated for testing. Based on this guidance, positions that fell under one of these designations were coded as TDP.

The Air Force later determined that it was not legally sufficient to require a position with an SAR code of 7 to be coded as TDP. Therefore, subsequent guidance, issued October 18, 2012 deleted the requirement for all SAR code 7 positions to be automatically designated as TDPs. The guidance clarified that only SAR code 7 positions that involve access to Secret or Confidential National Security material or information, or duties that may or indirectly adversely affect the National Security operations of an agency, be designated as TDP. The guidance also eliminated some of the series with a driving requirement and clarified that all positions with a driving requirement did not require drug testing.

Currently, the Eglin Civilian Personnel Section (CPS) is conducting an audit of all occupational series, SAR codes, and drug test codes in the Defense Civilian Personnel Data System (DCPDS) to accurately determine TDPs. The audit requires the CPS to work closely with management officials in determining whether a position, based on the current provisions of AFI 44-107, has a TDP requirement. Because the Eglin CPS does not have the capability to update the TDP codes in DCPDS, the CPS is required to provide a list of positions that are inappropriately designated as TDP to the Air Force Personnel Operations Agency (AFPOA) for updating DCPDS. The estimated completion date of the audit is June 30, 2013. Eglin CPS has

requested AFPOA prioritize TDP coding changes and will monitor AFPOA's progress on updating these positions until they have all been accurately coded.

In addition, the CPS is providing updated TDP testing-eligible rosters to the Drug Demand Office every two weeks until the audit is complete. Those positions with changes "pending" at AFPOA are excluded from the TDP testing-eligible roster to mitigate the number of personnel erroneously subjected to testing.

We trust this information is helpful.

Sincerely,

A handwritten signature in black ink, appearing to read "JML", written in a cursive style.

JOHN M. LARSON, Colonel, USAF  
Chief, Congressional Inquiry Division  
Office of Legislative Liaison

