Navy Substance Prevention and Deterrence 2026

Guide 4

Medical Review Process (MRP)

Preface

This guide establishes the authoritative procedures for the management, execution, and oversight of the Navy Substance Prevention and Deterrence program, in strict accordance with the OPNAVINST 5350.4 series. It serves as the foundational resource for all personnel engaged in the daily administration of this program.

Contained herein are the requisite step-by-step procedures and critical legal requirements that shall govern all program operations. Adherence to this guidance is mandatory to ensure the efficiency, quality, and integrity of the Substance Prevention and Deterrence program.

Any deviation from the policies stipulated in the OPNAVINST 5350.4 series or this associated Operational Guide is prohibited without the express prior written consent of OPNAV N173. Recommendations for modifications to this guide shall be submitted directly to OPNAV N173 for review and consideration.

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1. Overview. OPNAV N173A manages Navy's medical review process (MRP) to ensure all drug positive results are properly annotated as authorized/legitimate or wrongful/illegitimate use. Additionally, MRP ensures that no adverse disciplinary action will be administered to those whose positive drug test is the result of authorized and legitimate prescription drug use.

2. Responsibilities

a. Commands. Upon receipt of a positive urinalysis result potentially caused by the use of prescribed drugs or treatment, the command will initiate an investigation into the circumstances that led to the positive result and obtain a technical review from the servicing drug screening laboratory forensic toxicology expert.

(1) The command investigation must establish the legitimate link between the service member and the prescription.

(2) All drug positives reported by the Forensic Toxicology Drug Testing Laboratory (FTDTL) are reported as cases of drug misuse to the Defense Manpower Data Center (DMDC) after 90 days from the date reported in iFTDTL. Due to the time-sensitive reporting, commanding officers must submit recommendation letters and supporting documentation including technical reviews for those positives that are not cases of drug misuse within 60 days of the report date in iFTDTL to OPNAV N173A to undergo the MRP. The MRP is required for all positive drug results that could be the result of lawful or illicit prescription drug use or in consideration of reasonable innocent or unknowing ingestion (IUI) claims, see IUI section of this Guide.

(3) Expedite investigation and medical review process for any positive with an "At Risk" notification in iFTDTL. "At Risk" notification is issued when a specimen is positive for fentanyl or norfentanyl, or positive for at least two different drug classes, potentially placing the member at a higher risk of health and safety issues, including overdose. If the review finds the positive result did not originate from legitimate medical use, the member identified as "At Risk" should immediately be referred for substance misuse screening.

(4) Prescriptions are valid for the period as written by the prescribing authority to only the Service member. Absent a specified time period when prescribed, prescriptions for substances included on Schedules II through V of Section 812 of Title 21, United States Code, will be considered expired six (6) months after the most recent date of filling, which is indicated on the label. For example, a prescription with a fill date of August 14th will be considered expired after February 14th of the following year. If the prescription is no longer considered valid but the prescribing care provider or current DoD care provider affirms the member still requires the medication then the commanding officer (CO) should submit the recommendation letter with the care provider's recommendation enclosed to OPNAV N173A, see Contact section of this Guide.

(5) Service records of all members who engage in or are identified as being involved in

drug misuse must be flagged by OPNAV N173A to prevent reenlistment or transfer until resolved.

b. OPNAV N173A. All drug positive urinalysis results are reviewed by a Review Officer (RO) in the N173A office to assess authorized/legitimate use or wrongful/illegitimate use within 90 days of notification of a positive result. The RO will make a determination through review of all submitted documents, technical reviews and available records, such as documentation from the command-level investigation, prescriptions documented in electronic health record systems, hard copy medical records, prescription bottles, or physician statements documenting drugs administered during medical or dental procedures. If a recommendation does not contain supporting documents, the request is returned to the command. The command may resubmit the CO recommendation with necessary supporting documentation for reconsideration. The positive will remain until properly adjudicated with OPNAV N173.

(1) If the determination made by the RO is "authorized/legitimate use," no further action is required by the command. RO will initiate removal of the positive result from the Alcohol and Drug Management Information Tracking System (ADMITS) and notify the command of the determination via email.

(2) If the determination made by the RO is "unauthorized/illegitimate use," OPNAV N173A will notify the command, i.e., the CO, the Drug and Alcohol Program Advisor (DAPA), the Urinalysis Program Coordinator (UPC), or delegated command point of contact of the determination via email. All positive results that are not the result of authorized/legitimate use of prescription medication must be processed for administrative separation.

(3) Final determination to remove a positive result from ADMITS rests with OPNAV N173A. No positive results determined to be wrongful/illegitimate will be removed from the ADMITS database.

3. Innocent and Unknowing Ingestion (IUI)

a. In rare instances, a member may have been innocently or unknowingly exposed to drugs resulting in a drug positive. For these drug positive cases, the command will conduct a preliminary inquiry as with any other MRP case, capturing any known details of the suspected exposure to any invalid or expired prescription or illicit drugs, including but not limited to the timeframe and duration of exposure, mode of introduction into the body, circumstances and knowledge level of suspected exposure, actions taken to end exposure or egress from exposure environment, or if a report was made, etc. When circumstances of drug exposure are completely unknown, OPNAV N173 will not have the sufficient information for assessment and the matter warrants appropriate administrative separation processing, i.e., administrative board or board of inquiry.

b. The command should build an environment of trust and unity to encourage members to report such cases of drug exposure immediately and to seek medical care vice waiting for a drug positive test to report the incident.

c. Technical support through a technical review, technical statement or other support services from the servicing laboratory may aid the CO in reaching their recommendation. A technical review assesses if a prescribed substance, as indicated in the supporting documentation supplied by the command in the technical review request, may or may not cause the positive result. Commands may request a technical statement from the servicing laboratory to answer specific questions supplied by the command in a technical statement request. The command should discuss what information is required for technical support with the laboratory prior to submitting their request in IUI cases due to the nuances of individual cases.

d. If found to be a reasonable IUI claim, the command will forward their recommendation as with any other MRP recommendation following the Procedures section.

(1) If OPNAV N173 determines that the case meets reasonable criteria, including but not limited to the facts regarding the exposure, the member's drug testing history and IUI claim history, then the concurring determination will be sent to the command and the positive will be removed from ADMITS within 30 days.

(2) If a non-concurrence determination is made, then the matter is returned to the command to continue the administrative separation process.

(3) All members with cases of IUI should receive screening for substance use disorder and training to avoid any future exposures to drugs.

4. Procedures

a. On notification of a positive urinalysis, commands will review the circumstances to recommend if the positive is a potential case of drug misuse. All positives must be reviewed and assessed. Positives marked "At Risk" must be reviewed immediately to avoid potential risk of overdose by the member if the positive did not originate from a medical procedure or prescription. It is recommended that the UPC and DAPA are excluded from leading the command investigation into positive urinalysis results due to potential conflict of interest. Positives that are subsequent to a member's initial positive may be combined into a single case for review. The laboratory accessioning number (LAN) for each positive must be referenced in the recommendation letter.

b. If the command inquiry into the drug positive reveals that prescription drug was the cause of the positive, then the command must request a technical review from the servicing drug laboratory prior to submitting their letter of recommendation to OPNAV N173. Laboratories do not have access to a universal system that can check to see if a member was prescribed anything that would cause the drug positive. Medical information must be supplied to the laboratory by the command in the technical review request. Limit the release of protected health information (PHI) to only the relevant information, e.g., name of prescribed drug and the most recent fill date prior to specimen collection date or name of the administered drug and date administered. Commands must verify that the prescription belongs to the member and the date of the prescription. Medical diagnosis is not relevant to the technical review.

(1) For internal prescriptions: All prescriptions originating from Tricare providers must be verified in Military Health System (MHS) Genesis or with the prescribing physician by the command investigation. A printout alone from MHS Genesis or another Defense Health Agency (DHA) system is no longer sufficient for verifying a prescription because it can be generated by artificial intelligence (AI). Ensure the information is legitimate and is transmitted by a verified provider or other trusted agent.

(2) For external prescriptions: If a prescription originated from a non-DHA provider, contact the pharmacy or provider to confirm legitimacy and member's patient status (a printout from the pharmacy, photo of a bottle label, or other documentation is no longer sufficient for verifying a prescription because it can be generated by AI).

(3) Verify the provider's National Provider Identification (NPI) via the NPI registry (https://npiregistry.cms.hhs.gov/search).

(4) The command must submit a signed memorandum from the DHA medical provider with the CO's recommendation package to OPNAV N173 affirming the validity of the prescription listing the name of the prescription drug, the name of the patient, the date of last fill prior to the collection date, expiration date, and NPI of prescriber. If this cannot be accomplished due to operational limitations, please coordinate with OPNAV N173A.

(5) Specific document requirements to obtain a technical review from the servicing drug laboratory includes providing substantiating prescription records and specimen-specific information, see Appendix for example technical review request letter.

(6) For an IUI claim involving an expired or otherwise invalid prescription exposure, the command should request a technical statement to address command inquiry questions regarding the suspected exposure to help inform CO recommendation.

c. If the totality of information supports a case of authorized/legitimate use, the CO will forward all information to be considered along with their recommendation of "authorized/legitimate use" to OPNAV N173 for final determination with a copy to their Echelon 2 and 3 Alcohol and Drug Control Officer (ADCO). See sample command recommendation of positive urinalysis letter, see Appendix.

d. If the review supports a case of wrongful/illegitimate use, the CO will notify OPNAV N173A, take disciplinary action as appropriate and initiate administrative separation procedures. The command must provide a monthly update letter to OPNAV N173A on each wrongful/illegitimate use drug positive case that is 30 days past initial notification until a final decision has been determined. The preferred delivery method for the update notification is via email to MILL-N17-DDR@us.navy.mil also usn.mid-south.chnavpersmiltn.mbx.mill-n17-ddr@us.navy.mil (for encryption, please send files via DoD SAFE to listed emails) or it may be mailed to:

Substance Prevention and Deterrence (OPNAV N173A)
Attn: DDR Section (MRO)

5720 Integrity Drive, Bldg. 457
Millington, TN 38055

e. The command will obtain a technical review from their servicing drug laboratory for all cases where the member's positive is suspected or reported to be from prescribed or medically administered drug use. Illicit drugs, such as, but not limited to marijuana, cocaine, synthetic cannabinoids, heroin, ecstasy, and d-methamphetamine, typically have no legitimate medical use and are not subject to technical review unless their presence is potentially the result of a prescribed medication or procedure.

f. All members whose positive results are not the result of authorized/legitimate use must be processed for administrative separation. Commands must notify OPNAV N173A of the final outcome of all drug positive administrative separation processes via one of the following:

(1) Drug and Alcohol Report (DAR) reporting of finalized outcome of administrative separation process.

(2) Official message or letter from PERS-8 or PERS-9 indicating no further action is required or member is retained.

(3) An official letter from the command containing the Board of Inquiry (BOI) result.

(4) An official letter that includes a copy of the courts-martial findings in cases where member is retained.

g. COs will ensure that when appropriate, active duty personnel who are subsequently retained following an administrative separation board or court-martial proceeding be screened for a substance use disorder. Any member discharged from a drug treatment program in accordance with DoDI 1010.04 must undergo monthly random drug monitoring (testing) for 1 year. Those personnel with special duty requirements may have additional drug monitoring standards imposed by professional boards or DoD policy.

Appendix - Example Technical Review Request (use official letterhead):

5355
Ser Code/####
DD Mon YY

From: Commanding Officer, Command, City, State
To: Commanding Officer, Navy Drug Screening Laboratory, Jacksonville/Great Lakes

Subj: REQUEST FOR TECHNICAL REVIEW ICO LAN XXXXXXXXXXX

Ref: (a) PHONCON Command Person/NAVDRUGLAB Person of DD Mon YY

Encl: (1) Verified, Linkable Information Prescription Profile

1. Per reference (a), please complete a Technical Review concerning the positive result reported for the urinalysis specimen identified by:

a. Batch # / Specimen #: #### / ###
b. Collection Date: DD Mon YY
c. LAN: XXXXXXXXXXX
d. Drug(s): List from iFTDTL

2. Enclosure (1), provided in support of this request, contains prescription information for the Service Member who's urinalysis specimen is identified by the subject LAN (XXXXXXXXXXX). This information is non-repudiable (e.g., printed prescription profile with prescription issuance dates) and verifiably-linked to the Service member.

3. Please forward the completed Technical review by mail/email/FAX to physical address/email address/FAX number (FAX delivery shall be coordinated with my point of contact [POC] for this matter in paragraph 4, below).

4. My POC for this matter is Rank/Rate Full Name at e-mail address and telephone number plus extension.

/s/
C. O. NAME or By Direction

Appendix - Example Recommendation Letter (use official letterhead):

5355
Ser Code/####
DD Mon YY

From: Commanding Officer, (insert command name)
To: Director, Navy Substance Prevention and Deterrence Branch (N173)

Subj: RECOMMENDATION REGARDING POSITIVE URINALYSIS IN CASE OF (RANK/RATE, FULL NAME, BRANCH OF SERVICE)

Ref: (a) OPNAVINST 5350.4E
(b) iFTDTL website

Encl: (1) NDSL Great Lakes/Jacksonville Technical Review of SNM Sample
(2) Service Medical Provider Memo Affirming the Verified Prescription Information (See Procedures Section)

1. Per reference (a), I recommend that the positive urinalysis result reported via reference (b) in the case of (Rate/Rank and last name) not be recorded as an incident of drug misuse, as detailed below.

2. (Rate/Rank and last name) tested positive for (test result) on the urinalysis test in the amount of _ng/ml on (sample collection date), recorded as LAN# (insert sample LAN). (Rate/Rank and last name)’s medical record verifies that they have an authorized prescription for (prescribed drug by name, e.g. Guaifenesin with Codeine) which was taken as prescribed prior to testing.

3. Per reference (a), chapter 4, paragraph 6 and based on review of (Rate/Rank and last name)'s medical record in light of enclosure (1), it is recommended that the positive in question not be regarded as a drug misuse incident.

4. My command point of contact is (Name, phone, email).

CO's signature

Copy to:
TYCOM ADCO