

From: Roberts, David :LPH Lab
Sent: Thursday, November 19, 2009 8:49 PM
To: LoDico, Charles P. (SAMHSA/CSAP)
Subject: revised federal ccf
Dear Mr.. Lodico,

Step 1d, while perhaps convenient for data management, is an unnecessary complication to the form. With all due respect this will not be easy for Collection Sites to know or record. If testing is not to be held up- then the data entry become voluntary. If it is voluntary- compliance will be low. If at some future point it is added as one of the required data fields- there will be a cost burden to labs who report electronically to add this field to their data transmission. If it added as a required data field- then the lab will assume the burden of acquiring this data for the convenience of federal agencies. All federal agencies get statistical reports already- why not compile the data based on the required statistical reports.

We request that you to remove this line on the form for the reasons stated above.

Thanks for your consideration,

David K. Roberts, PhD
Toxicology Section Manager & RP
Legacy Laboratory Services; Metro Lab
1225 NE 2nd Ave
Portland, OR 97232