

January 15, 2010

Robert L. Stephenson II, MPH  
Division of Workplace Programs, CSAP  
1 Choke Cherry Road  
Room 2-1035  
Rockville, MD 20857

Dear Mr. Stephenson;

As an industry leader, Fortune 500 company and one of the largest transportation service providers in the world, we, YRC Worldwide—including YRC, YRC Reimer, YRC Glen Moore, YRC Logistics, New Penn, Holland, Reddaway, submit the comments contained in this letter in response to the Proposed Revisions to Federal Drug Testing Custody and Control Form, published in the Federal Register / Vol. 74, No. 220 / Tuesday, November 17, 2009.

As a trucking firm with approx. 40,000 CDL drivers under the FMCA agency, and having been active and compliant with the rules and regulations as outlined by the Omnibus Transportation Employee Testing Act (OTETA), DOT 49 CFR Part 40 and the FMCA agency regulations and a user of service agents such as Third Party Administrators (TPA), specimen collection facilities, laboratories, medical review officers (MRO) and substance abuse professionals (SAP), we appreciate this opportunity to provide comments based on our many years of administering these tests to our drivers.

Comments on the Proposed Revisions to the Federal Custody and Control Form.

Step 1 C—As an employer with employees who have been provided with employee ID cards and because employees are balking at using a Social Security Number (SSN) as a personal ID for the CCF with concerns of identity theft, we propose that the 'Donor Identification No.' be either the employee company photo ID or the donor's CDL number from his commercial driving license. The Donor Photo ID No. would be entered by the collector from the photo ID the donor presents. 1C could also include "check boxes" for the collector to note the type of photo ID presented (e.g. CDL, driver's license, employee ID). This change would have the additional value of providing documentation that the collector did view and note the photo ID presented by the donor.

Step 2—The collector remarks area needs to be larger on the CCF. Complete and legible documentation by the collector of atypical specimen collections is essential to the final resolution of the testing event (e.g., shy bladder situations). The space provided, especially since entries must be handwritten, is inadequate.

There does constantly seem to be issues with the legibility of the written portion of the CCF. Reading the driver's printed name, handwritten name, telephone number, etc. seems to be a hurdle that vendors and our staff alike are constantly spending an inordinate amount of time rectifying so that the test is properly reported. We would recommend that DHHS consider options for printing and completing the federal CCF that allow the use of software applications for printing and entering data on the form at the collection facility or site. There are currently drug testing laboratories, collection sites, TPAs, and other service providers that are using technology to produce forensically viable carbonless drug testing custody and control forms for non-Federal testing. We feel that using these applications would provide more accurate, legible and complete CCF's for each of the tests that we perform and that electronically imaged transmission of copies of the CCF to the MRO and employer is more efficient.

We appreciate the opportunity to comment on the Proposed Revisions to the Federal Drug Testing Custody and Control Form. Please feel free to contact me if you have questions or need clarification on any of the comments presented above.

Very truly yours,

YRC Worldwide

Barbara L. Crews – DER & Manager  
Controlled Substance Program