

From: Maria E. Spore
Sent: Monday, January 18, 2010 5:59 PM
To: LoDico, Charles P. (SAMHSA/CSAP)
Subject: Comments on Proposed revision of CCF

Below are a few comments on the Proposed Revisions to the Federal Drug Testing Custody and Control Form.

Section 8.8 When is a direct observed collection conducted?

(c) The collector must contact a collection site supervisor to review and concur in advance with any decision by the collector to obtain a specimen under direct observation.

I do not understand the point of conferring with a collection site supervisor. A urine collector has already received the applicable training in order to perform collections & I believe that then qualifies them to under when to obtain a sample under direct observation. In many cases, when there is a larger medical center involved, it may delay the D.O. process by requiring a discussion with a supervisor. In that instance the supervisor may be in meetings or attending to other issues at another one of their locations.

Regarding Step 1 of the CCF, will the DER and or TPA be allowed to ask the lab to pre-mark the Agency Box (1D) when printing the forms? It would be beneficial to allow the lab to have this pre-marked to prevent collection site errors.

Sincerely,

Maria E. Spore
CEO, CPC, BAT

Controlled Substance Managers, Inc.
2741 Ridge Road | Second Floor
Lansing, IL 60438

<http://www.controlledsubstancemanagers.com/>

IMPORTANT NOTICE - This e-mail transmission and any accompanying attachments may contain confidential information intended only for the use of the individual or entity named above. Any dissemination, distribution, copying or action taken in reliance on the contents of this e-mail by anyone other than the intended recipient is strictly prohibited and is not intended to, in anyway, waive privilege or confidentiality. If you have received this e-mail in error please immediately delete it and notify sender at the above e-mail address.