

Comments to:

Department of Health and Human Services
Substance Abuse and Mental Health Services Administration
Proposed Revisions to Federal Drug Testing Custody and Control Form
Federal Register Vol. 74, No. 220
Tuesday, November 17, 2009

Submitted by:

First Advantage

Josephine Elizabeth Kenney, J.D.

January 19, 2010

Contact for Questions:

Josephine Elizabeth Kenney, J.D.

Senior Vice President of Compliance

Occupational Health Group

Employment Screening Services Division

First Advantage

First Advantage appreciates the opportunity to comment on the Department of Health and Human Services, Substance Abuse and Mental Health Services Administration's Proposed Revisions to the Federal Drug Testing Custody and Control Form. We generally support the revisions to the Custody and Control Form included in Federal Register Vol. 74, No. 220.

However, we also believe that the comments on the proposed revisions to the Federal Custody and Control Form made by the Substance Abuse Program Administrators Association (SAPAA) and the Drug and Alcohol Testing Industry Association (DATIA) merit careful scrutiny and close consideration.

First Advantage hereby echoes and highlights two important matters in particular, because we believe that these two comments are important to the future industry growth and development, would result in improvements to Drug and Alcohol Testing processes and procedures, and would contribute to the overall mission of the federal programs. These two matters are 1) the further exploration and the need for near term regulatory authority/permmissibility to utilize electronic support systems in specimen collection and test processing, and 2) the need to further explore and resolve the conundrum concerning the use of social security numbers as personal identifiers on the Federal Custody and Control Form.

Lastly, First Advantage supports SAPAA's Comments 3. and 4. which address the re-ordering of the steps on the Federal Custody and Control Form to prevent collector errors and the need for additional space in the Remarks Section of the form.

SAPAA Comment 3.

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. The space provided, especially since entries must be handwritten, is inadequate.

SAPAA Comment 4.

Steps 4 and 5 - One of the more frequent omissions collectors make in completing the federal CCF is “forgetting” to have the donor complete Step 5. In part, this error is contributed to by the instructions that the collector is to “do” Step 5 before completing Step 4. This is further confusing for some collectors because Step 5 is not on Copy 1 of the CCF, but Steps 5a and 5b are on Copy 1. All other Steps on the CCF are numbered in accordance with their chronological order. The following changes are recommended:

Step 3—Remove statement “Donor completes Step 5 on Copy 2 (MRO copy)”

Step 4—Change to “Donor completes Step 4 on Copy 2 (MRO Copy)”

Step 5—Chain of Custody-Initiated by collector and completed by Test Facility