

From: Walsh, Cheryl

Sent: Tuesday, January 19, 2010 3:46 PM

To: LoDico, Charles P. (SAMHSA/CSAP)

Subject: Comments on Proposed Revisions to the Drug Testing Custody and Control Form

Following are our comments regarding the proposed revisions to the Federal Drug Testing Custody and Control Form.

1. While the new testing requirements go into effect on May 1, 2010, the NPRM does not discuss the transition period for use of the new CCF. Is there a mandatory "go live" date for having the new form in circulation? Since the current CCF has been approved for use through 2012, will companies be able to use the current CCF through that date? If not, what are the ramifications for using the current CCF after the new CCF has been approved.
2. Regarding the seals on the labels, are the specimen numbers required to imprint in two places on each label? Can a second ink color be added to the label for the lab to have color coded specimens? Do the date and Donor Initials have to be on the right?
3. If a laboratory chooses a larger label format than the recommended ½ inch size, can less space be utilized for sections (such as the remarks section in step 2) of the form to accommodate a larger label?
4. As we understand the process, once a specimen is collected and ply 1 filled out, the form is separated and the MRO receives ply 2 of the form (either by fax or hardcopy). Therefore the MRO information that is pre-printed on plies 3, 4 and 5 never actually gets filled in. We propose that the MRO information be removed from these plies and this space utilized for instructional purposes or other information. This also eliminates the need for desensitizing ink on these plies and can reduce cost in manufacturing the forms.

Standard Register thanks HHS for the opportunity to provide comments on the proposed revisions to the Federal Custody and Control Form. Please feel free to contact me if you would like to further discuss any of our comments.

Kind regards,

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