

From: Looney, Vicky V. (NSSC-NSSC)[Service Provider]
Sent: Tuesday, January 19, 2010 6:01 PM
To: LoDico, Charles P. (SAMHSA/CSAP)
Subject: Comments regarding Federal Custody and Control Form

Dear Mr. Lodico,

I have administered NASA's national drug test program since 2006. The NASA Drug Test team has encountered countless problems requiring hundreds of work hours due to the poor quality of the copies of the Custody and Control Form (CCF), especially when they are faxed. MRO copies of the CCFs are frequently faxed to the Medical Review Officers (MROs), and they must have a legible copy of the CCF in order to report test results. This is frequently very difficult to accomplish.

Additionally, when NASA tests applicants, the CCFs must be Fed-Exed to them, and they may be located anywhere in the world. This entails considerable time and expense. All other applicant forms are available to applicants via the internet, but CCFs could not be added due to their current format.

When I learned of the new electronic CCF for non-regulated tests, I was delighted because I felt certain that the next revision of the Federal CCF would also allow this format. The current type of multi-page, carbonless form went out with the last century and does not work in this digital age and our move to becoming "paperless." Electronic CCFs would ensure that the information is always current; at present, there is considerable waste when we must throw away our current supply of CCFs due to a change in an individual NASA Center's pre-printed CCF due to a new MRO or address, telephone number, etc.

Electronic CCFs would provide current information and eliminate the problem of illegible CCFs as well as the need to overnight forms to applicants. I hope that SAMHSA will seriously consider allowing this option for Federal CCFs.

Thank you for your consideration of these comments,

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