

LITTLETON REGIONAL HOSPITAL
Occupational Health Department
600 St Johnsbury Road
Littleton, NH 03561

January 12, 2010

Robert .L Stephenson II,
M.P.H., Director, Division of Workplace Programs (DWP),
Center for Substance Abuse Prevention (CSAP),
1 Choke Cherry Road, Room 2-1035,
Rockville, MD 20857
<mailto:charles.lodico@samhsa.hhs.gov>

Dear Mr. Stephenson;

Please consider these comments to the Department of Health and Human Services Substance Abuse and Mental Services Administration's Notice of Proposed Revisions to Federal Chain of Custody Control Forms found in the Federal Register November 17, 2009.

Our facility actively performs regulated drug test collections as well as other drug testing services for DOT regulated employers. As a current user of eScreen's electronic CCF, we have found this method of creating a CCF to be superior and results in fewer problems than hand written 5-part paper custody and control forms.

Additionally, collection sites store thousands of forms. Millions of outdated, obsolete, and inaccurate forms exist in collection sites and employers' desks. These outdated paper CCF forms create countless problems for labs, collectors, MRO and employers. There is a better way to create forms when needed with current information. Printing the electronic CCF at the collection site when needed eliminates form storage and the misuse of outdated and inaccurate forms.

With electronic CCF we no longer have to fax or mail copies and we have immediate access to an electronic record of each CCF and drug test collection performed by us.

We urge HHS to immediately approve an electronic version of the federal CCF.

Sincerely,

Wendy H. Mason, Manager
Occupational Health Services

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