

**From:** Kimi Hathaway  
**Sent:** Monday, January 11, 2010 10:11 AM  
**To:** LoDico, Charles P. (SAMHSA/CSAP)

Dear Mr. Lodico:

Following are the comments of Blackbird Clinical Services on the Proposed Revisions to the Federal Drug Testing Custody and Control Form. Blackbird Clinical Services is a collection facility for all manner of drugs of abuse testing. We cater to DOT as well as Non-DOT clients and have over 10 years of experience in this field. We strongly urge HHS to consider mechanisms other than pre-printing of the new CCF. There are currently numerous labs, TPAs, and other service providers that are using technology to produce forensically viable carbonless chain of custody forms. We currently utilize these technologies for our Non-DOT clients and would significantly benefit from the use of the technology behind these applications for DOT clients for the following reasons:

- a. The data is input electronically, which eliminates the problems faced by labs, MROs, collectors, and employers trying to read a fax of a copy (which is already very faint and hard to read).
- b. Copies 2 and 4 can be sent electronically to the MRO and the employer, which they can then print out.
- c. This technology allows users to capture both a wet and digital signature thereby satisfying the HHS requirements.
- d. Labs, MROs, TPAs, and collection sites spend A LOT of time "chasing paper" to get the necessary copies of the CCF. This technology would save all service providers time.
- e. Many times after expending significant time and resources to get the needed copies of the CCF, one finds out that the copy is illegible. Computer produced and sent PDF copies of these forms would eliminate a tremendous amount of wasted effort and significantly reduce the frustration level with these program requirements.
- f. Computer produced forms can be easily stored and saved for retrieval should a form need to be reproduced.
- g. Computer generated CCFs with the employer and employee's information set-up electronically can solve several issues including print quality, wrong employer information, eliminate errors by not allowing collector to go to the next steps until all necessary information is completed in each section, etc

Blackbird Clinical Services thanks HHS for the opportunity to provide comments on the proposed revisions to the Federal Custody and Control Form. We trust that HHS will take our comments into consideration. Please feel free to contact me if you would like to further discuss any of the following comments.

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