

From: Mandy Croft

Sent: Monday, January 11, 2010 10:13 AM

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

Subject: (SAMHSA) proposed changes to the Federal Custody and Control Form

Attachments: Letter reg chain changes.doc

Thank you,

Mandy Croft
Vice President/VP of Operations
Lytle Drug Testing Services, Inc.
15 S. Montgomery Street
Hollidaysburg, PA 16648

Attachment:

LYTLE Drug Testing Services, Inc.
Hollidaysburg, PA
Pittsburgh, PA

January 5, 2010

Robert L. Stephenson II, MPH
Division of Workplace Programs, CSAP
1 Choke Cherry Road
Room 2-1035
Rockville, MD 20857

Dear Mr. Stephenson:

Following are the comments of the Drug & Alcohol Testing Industry Association (DATIA) on the Proposed Revisions to the Federal Drug Testing Custody and Control Form. DATIA is a 1,500+-member national trade association representing the full spectrum of drug and alcohol testing service agents including laboratories, collection sites, C/TPAs, BATs, MROs, SAPs, employers, and testing device manufacturers. DATIA's mission includes working closely with key policy makers in Federal Agencies and in Congress to ensure that the interests of the industry are heard and taken into account when changes in drug and alcohol testing rules are proposed. DATIA works to ensure that these changes foster rather than hinder the industry's growth. DATIA further works to educate the industry on current standards of service and regulatory policies and procedures. DATIA's comments on behalf of its constituency are based upon input from DATIA's members, Legislative & Regulatory Committee, and Board of Directors.

Our comments on the proposed mandatory guidelines follow.

1. Regarding standardization and sample integrity, the NPRM proposes that when an IITF cannot report a result for the specimen (i.e. negative, negative dilute, rejected for testing), the IITF is to use tamper evident tape to reseal the sample for shipment to an HHS laboratory. Why not create a third label on the CCF for the sole purpose of forwarding the sample? From an "integrity of the process" approach the idea of leaving the standard as "the remaining specimen will be resealed using tamper evident tape" seems too ambiguous and leaves the door open in the areas of donor protection and litigation potential.

2. Step 1 of the proposed CCF does not include a verification check box of the donor's ID. There should be an active check by the collector showing that he/she verified that the donor is who he or she says they are.

3. Regarding Step 1 of the CCF, will the DER and or TPA be allowed to ask the lab to pre-mark the Agency Box (1D) when printing the forms?

Thank you,

Mandy Croft
Vice President/VP of Operations
15 S. Montgomery Street
Hollidayburg, PA 16648

<http://www.lytletesting.org/>