

From: Richard E. Hipkins
Sent: Tuesday, January 12, 2010 1:09 PM
To: Stephenson, Bob (SAMHSA/CSAP)
Cc: LoDico, Charles P. (SAMHSA/CSAP); Eric Quilter
Subject: comments on revised federal drug testing custody and control form

bob, per our discussions please:

- see below for comments on the revised federal drug testing custody and control form (ccf)

- allow use of a ccf printed by a laser printer (electronic ccf - eccf)
- it provides all of the info that is on the current ccf; including info for the privacy act and paperwork reduction act
- it still has a unique specimen id number
- multiple copies can be printed at the collection site
- it still uses an original donor signature

- there are many advantages to the eccf including
- clinics don't have a problem with finding the donor's ccf; or worse yet; not having a ccf in order to complete the collection
- encrypted internet software programs allow you to preregister the collection info
- the software programs require collectors to follow the hhs collection procedures; or it will not allow the collection to be completed
- once completed; the collection event info (and images of the completed ccf) is automatically routed to the lab and mro
- agencies are better able to schedule; track; and report tests and results
- mros don't need to spend time finding the donor signed ccf at the clinics
- the overall eccf process saves a lot of time; money; and effort; the very things government is required to do
- it also follows the intent of the paperwork reduction act
- the eccf process easily meets the current chain of custody and forensic reliability requirements; which are at the core intent of the hhs testing program

- as you know; pembroke and compliance have conducted a test pilot program using the eccf; with doi; ft meade lab and quest lab
- numerous test specimens have successfully been submitted and processed and reported
- and all chain of custody; lab forensic reliability with specimens; and mro review and result mandates have been met

- now is the time to continue this eccf effort
- using a limited number of federal employee tests to be processed using this eccf method
- doi has volunteered to participate by providing specimens; the ft meade and quest labs have said they will analyze the specimens; and the pembroke mro agreed to review the results
- there would be only a minimal cost to doi to do this

- your ok to proceed would allow this carefully planned and controlled effort to make further advances in this electronic age

- also as you know; private industry has been using this methodology for years with great success
- and likely private industry would not be doing it if it was not reliable; efficient; and cost effective

- further; using the eccf will allow us to continue to look forward in streamlining the process
- and hopefully lead us to the time when electronic signatures; fingerprints; biometrics are being used

- please let us know if there are any questions

thanks