

National Toxicology Specialists, Inc.  
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Nashville, TN 37210  
<http://www.drugtestinfo.com/>

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

RE: Proposed Revisions to Federal Drug Testing Custody and Control Form (OMB NO. 0930-0158)

By email

Dear Mr. Stephenson,

Your office is seeking comment on the proposal to make major modifications to the Federal Drug Testing Custody and Control Form (CCF).

I have been a practicing MRO since 1995 and have seen the CCF revised before. I agree with the thoughts of the Pipeline Testing Consortium and American MRO.

In addition, I offer the following:

Step 2- I propose moving the "Observed, Enter Remarks" box next to the Temperature box to prompt the collector to immediately think of doing an observed collection when the temperature is out of range.

Step 2 - "Remarks." With the space saved from deleting the whole "received at IITF" box, there will plenty of room to add a couple of lines here and include a couple of checked boxes. One could say "Time Collection started" with a line after for those cases when the donor doesn't give an adequate sample the first time, and another could say "Directly Observed by" with a line after to write the name of the observer. If there is enough room, one could also put "Reason for Observed Sample" and a line after to prompt the collector to list it. This would greatly help the collectors remember to document the most likely reasons for entering remarks and help them do it expeditiously.

Step 3- Make it bigger and bolder! The extra line required will be provided by eliminating the "Specific Testing Authority" line and the "Received at IITF" box.

Step 6- add the drugs and boxes like under Step 5A and eliminate one of the remarks lines in step 6 and Step 7 to make room. I can't think a situation when I would need two lines to enter any MRO remarks. It is much easier and legible for the MRO to mark a

box than handwrite the name of the drug(s). Substitute an " Opiates" box for the 6-am, codeine and morphine. This will then continue to be current when other synthetic opiates are added to the panel (yes, I do think (hope) that will happen).

Thank you for the opportunity to comment.

I am available to discuss at your discretion.

Sincerely,

Greg Elam, M.D.  
Medical Review Officer  
National Toxicology Specialists Inc.