

From: Bachman, David C - Tucson, AZ
Sent: Thursday, January 14, 2010 8:52 AM
To: LoDico, Charles P. (SAMHSA/CSAP)
Subject: Electronic CCF

Attachments: eCCF.doc

Mr. Lodico,

Please find our support for the electronic CCF for DOT regulated testing.

Dave

Attachment:

NATIONAL MEDICAL ADMINISTRATOR
United States Postal Service
1501 S. CHERRYBELL STRAV
TUCSON ARIZONA 85726

14 January 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

Dear Mr. Stephenson,

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

We are subject to federally regulated drug testing under 49 CFR Part 40; DOT's drug testing program. We urge HHS to implement an electronic CCF. Paper custody and control forms (CCF) add costs and delays. We have implemented eScreen's electronic custody and control form (eCCF™) for our Non-DOT drug testing programs and find it to more efficiently support our programs, giving us faster access to reports and records.

Sincerely,

David C. Bachman, MD, FACS