

From: Steve Querio
Sent: Thursday, January 14, 2010 9:43 AM
To: LoDico, Charles P. (SAMHSA/CSAP)
Subject: Recommendation for electronic CCF

Attachments: January 12.pdf

Attachment:

January 12, 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

RE: Electronic CCF

Dear Mr. Stephenson:

I am writing today to ask that you consider my recommendations for the Department of Health and Human Services Substance Abuse and Mental Services Administration's Notice of Proposed Revisions to Federal Chain of Custody Control Forms found in the Federal Register November 17, 2009.

Our facility, Health Test 360, performs regulated drug test collections as well as other drug testing services for many DOT regulated employers. We use the eScreen system, which allows for an electronic chain of custody form and have found this to be faster, more efficient and with less error than the paper chain of custody process.

I have also found that both the donors and employers are much happier with the process for several reasons. These include, but are not limited to, it is a faster process for the donor, there are less errors, storage of paperwork is greatly reduced, and employers can easily access employee records through a secured network. Without doubt, I have found that employers are much happier with the electronic CCF format.

As a collection site, we are bombarded with requests to fax and refax chain of custody forms, even though we always fax them within several hours to both the employer and MRO. This time-wasting problem would be eliminated.

With the ever changing world of technology, I would request that the electronic CCF be immediately approved and implemented for federally regulated services. This is a winning solution for everyone and would make the process much smoother and more efficient.

Sincerely,
Steve Querio
Health Test 360
Genevita, LLC