

From: Savage, Mark
Sent: Thursday, January 14, 2010 1:58 PM
To: LoDico, Charles P. (SAMHSNCSAP)
Subject: Electronic CCF request

Attachments: Letter to CSAP re electronic CCF.pdf

Please see attached for your consideration.

Thank you.

Mark Savage
Director, Workforce Health
<http://www.myworkforcehealth.org/>

Two convenient locations in La Porte County, Indiana -- Michigan City & La Porte

GO GREEN with paperless, secure, online reporting ...receive your drug screen results in as little as 15 minutes!

Workforce Health is your employee health and productivity management resource: specializing in treatment of work-related injuries with case management and on-site physical therapy available, drug & alcohol testing, work-related physicals, ergonomics/injury prevention, EAP, employee wellness, and much more.

Attachment:

Workforce Health
Your Solution for a Healthy Business

La Porte Horizon Center
311 Boyd Blvd
La Parle, IN 46350

Dunes Plaza Complex
220 Dunes Plaza
Michigan City, IN 46360

January 14, 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 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 facilities actively perform regulated drug test collections as well as other drug testing services for DOT regulated employers. As a current user of eScreen's electronic CCF, we have found this method of creating a CCF to be superior and results in fewer problems than hand written 5-part paper custody and control forms. The system smoothly guides the collector through the collection process, thereby eliminating the chances of human error, including grabbing a non-Federal form instead of a Federal form.

Additionally, collection sites store thousands of forms. Millions of outdated, obsolete, and inaccurate forms exist in collection sites and employers' desks. These outdated paper CCF forms create countless problems for labs, collectors, MRO and employers. There is a better way to create forms when needed with current information. Printing the electronic CCF at the collection site when needed eliminates form storage and the misuse of outdated and inaccurate forms. Our clinics, as well as many others around the country just do not have room to store all of the CCFs needed for all of the clients we serve.

With electronic CCF we no longer have to fax or mail copies and we have immediate access to an electronic record of each CCF and drug test collection performed by us. We urge HHS to immediately approve an electronic version of the federal CCF.

Sincerely,

Mark Savage
Director
Workforce Health, LLC