

**From:** Crespin, Martin M  
**Sent:** Thursday, January 14, 2010 2:58 PM  
**To:** LoDico, Charles P. (SAMHSA/CSAP)  
**Cc:** Kowalkowski, Chris J  
**Subject:** HHS NPRM

To: Robert L Stephenson III, MPH  
Director Division of Workplace Programs  
Center for Substance Abuse Prevention  
Choke Cherry Road, Room 2-1035  
Rockville, MD 20857

Subject: Federal Custody and Control Form

Sir:

Please refer to the new proposed CCF that will be used for federal controlled substance testing. The majority of changes will benefit the public and testing services industry:

- Change to the top of the form on Copy 1 by increasing the area to place an account number or internal test number is a much needed improvement.
- On Copy 1 Step 1d adding in the federal authority is good long range planning.
- Changes to Copy 1 Step 4 will allow greater flexibility for specimen transfer.
- Restructuring Copy 1 Step 5 while adding in the new drugs makes the form easier to understand for the end user.
- Moving the majority of split specimen information on Copy 1 Step 5b to the MRO Copy 2 Step 7 is logical.
- On Copy 2 Step 7 providing greater area for the MRO to record findings is a good improvement.

Consideration should also be given to cost saving measures by removing redundant information at the expense of overall familiarity: Copy 3 Collector Copy, Copy 4 Employer Copy, and Copy 5 Donor Copy – Recommend deletion of Step 6 and Step 7 from all three Copies. Step 6 and Step 7 are not relevant on the copies identified, nor are these Steps *ever* completed on the Collector, Employer, or Donor copy. These areas could be left blank or modified to have the Title “Notes” with a few blank lines for the donor to record medications taken at the time of testing, collector to make notes regarding their handling that is not relevant to the MRO or lab, and the employer to record handling or test issues. Cost to print the CCF may be reduced by deleting portions not used.

In summary, the changes proposed should be approved as the new CCF will be an improvement over what is being used today.

Thank you,

*Martin M. Crespin*  
*Mgr Med Supp Svc*  
BNSF Railway

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