

From: Gary W. Evans
Sent: Thursday, January 14, 2010 7:19 PM
To: LoDico, Charles P. (SAMHSA/CSAP)
Cc: GARY Ridgeway
Subject: Electronic CCF

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 facility actively performs regulated drug test collections as well as other drug testing services for DOT regulated employers. As a current user of eScreen, Quest and Labcorp'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.

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 Millions of outdated, obsolete, and inaccurate forms exist in collection sites and employers' desks. These outdated paper CCF forms create countless problems for labs, collectors, MRO and employers.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 Printing the electronic CCF at the collection site when needed eliminates form storage and the misuse of outdated and inaccurate forms.

With an electronic CCF we would no longer have to fax or mail copies and would 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.

Thank you for your time and consideration in this matter.

Sincerely,

Gary W. Evans, D.C.
Bakersfield Drug Testing
A Division of West Coast Drug Testing, Inc.
930 Truxtun Ave., #102
Bakersfield, CA 93301

This communication contains information that is confidential, proprietary in nature, and may also be attorney-client privileged and/or work product privileged. It is for the exclusive use of the intended recipient(s). If you are not the intended recipient(s) or the person responsible for delivering it to the intended recipient(s), please note that any form of dissemination, distribution or copying of this communication is strictly prohibited and may be unlawful. If you have received this communication in error, please immediately notify the sender and delete the original communication. Thank you for your cooperation.

Please be advised that neither Bakersfield Drug Testing, its affiliates, its employees or agents accept liability for any errors, omissions or damages caused by delays of receipt or by any virus infection in this message or its attachments, or which may otherwise arise as a result of this e-mail transmission.