

Concentra
5080 Spectrum Drive
Suite 1200 West
Addison, TX 75001
T 972-364-8000
<http://www.concentra.com/>

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

RE: Proposed Revisions to Federal Drug Testing Custody and Control Form (OMB NO. 0930-0158)

Dear Mr. Stephenson,

For over 30 years, Concentra has been providing drug test collection services for regulated and non-regulated workplace testing programs at our 300+ medical centers, mobile testing units and on-site workplace locations. Over the past two years, Concentra has begun development, testing and implementation of processes allowing us to produce non-regulated CCFs on demand via a laser printer. We believe it would be beneficial for collectors, labs, MROs and employers to have access to electronically generated CCFs for both federally regulated and non-regulated tests for the following reasons:

Software systems that govern the collection process improve the collector's ability to correctly follow collection site procedures, thereby improving process integrity and reducing fatal flaws.

CCFs printed using software at the collection site use the most up-to-date employer, laboratory, and MRO information, ensuring that outdated, inaccurate paper forms are not used. This also eliminates the need to store and manage large quantities of paper forms at each collection site.

The data collected on CCFs produced with collection site software and laser printers is much more legible than handwritten, carbonless forms. This further improves data integrity for all users of the CCF.

Collection site software allows use of more reliable and timely methods of CCF copy distribution. For example, our current process for non-regulated tests makes Copy 2 immediately available to the MRO via fax or the internet. It is far more reliable, legible, and timely than the manual faxing of a handwritten, carbonless Copy 2.

Collection site software systems allow employers and service providers to "order" tests electronically, which greatly reduces the possibility of data gathering errors (donor ID, name,

DOB, employer, reason for test, etc.) by the collector. This will become even more important because the proposed CCF requires the collector to indicate the testing authority. Online ordering allows the employer to provide that information directly, rather than rely on the donor to relay the information to the collector correctly.

Software systems provide vastly improved record-keeping tools and access to historical information, as compared to paper-based filing systems, especially the ultra-thin carbonless paper stock used by most federal CCFs.

Since most non-regulated testing is rapidly moving to this newer technology, Concentra prefers to keep federal and non-federal procedures as similar as possible. Mandating a form that prohibits the use of this technology will require all collection sites to maintain separate processes for procedures, training, and record-keeping, thereby increasing the cost of delivering services. We strongly urge SAMHSA to consider minor modifications to the proposed CCF to make it friendly to “on-demand” production with applicable collection-site software and a laser printer. Thank you for the opportunity to participate in the rule-making process and for taking these comments into consideration on this important topic.

Sincerely,

Ted Bucknam

Ted Bucknam
President
Concentra Medical Centers