

LabCorp  
Laboratory Corporation of America  
Laboratory Corporation of America Holdings  
531 South Spring Street  
Burlington, North Carolina 27215

Donald E. Horton, Jr.  
Vice President, Public Policy & Advocacy

January 19, 2010

Mr. Robert L. Stephenson II, M.P.H.  
Director, Division of Workplace Programs  
Center for Substance Abuse Prevention  
1 Choke Cherry Road, Room 2-1035  
Rockville, MD 20857

Re: FR Doc. E9-27271, Substance Abuse and Mental Health Services Administration (SAMHSA) Proposed Revisions to Federal Drug Testing Custody and Control Form

Dear Mr. Stephenson,

Laboratory Corporation of America Holdings ("LabCorp") is pleased to offer the following comments in response to the above-captioned proposal to revise the Federal Drug Testing Custody and Control Form ("Federal CCF"), notice of which was published in the Federal Register on Tuesday, November 17, 2009 at 74 Fed. Reg. 59196.

With four SAMHSA-certified laboratories throughout the United States, LabCorp is one of the largest occupational substance abuse testing providers in the world. As a provider of Federal workplace drug testing services, LabCorp is directly affected by the proposed revisions to the Federal CCF. Our comments focus not on the substance or format of the proposed revised Federal CCF, but on the manner of its implementation.

First, it is critical that sufficient lead time be provided for implementation of the revised Federal CCF. Once the revised Federal CCF is approved, our vendor requires an eight (8) week processing period before providing the revised forms to us, to be followed by a period of at least thirty (30) days during which the new forms must be printed for over 100,000 accounts and stocked at appropriate locations, including client offices and collection sites. We would appreciate prompt approval of the revised Federal CCF and clarification regarding whether the revised Federal CCF must be stocked at collection sites by May 1, 2010.

Further, after May 1, 2010, expired Federal CCFs will remain at collection sites. A transition period should be established during which SAMHSA laboratories would be permitted to accept either the expired Federal CCF or the revised Federal CCF to reduce costs associated with discarding of the expired form and to avoid disruptions in

service that could result from rejection of expired Federal CCFs that may have been submitted by the collection sites. Submission of expired forms after May 1, 2010 could occur as a result of the desire of collection sites to deplete their existing supply of forms, or as a result of not having the revised Federal CCF in stock. Following this transition period, SAMHSA laboratories should be allowed to obtain a signed statement from the collector (i.e., a memorandum for the record) as provided for in 49 C.F.R. § 40.205 to accept specimens submitted on the expired Federal form. LabCorp would contact those accounts still submitting expired forms during the transition period to ensure they had received the revised Federal CCF. We would suggest that this transition period begin on May 1, 2010 and expire on June 1, 2010.

LabCorp appreciates the opportunity to comment on the revised Federal CCF and its implementation. We look forward to working with you to ensure that this transition occurs as effectively and efficiently as possible.

Very truly yours,

Donald E. Horton, Jr.  
Vice President, Public Policy & Advocacy

Labcorp Comments To SAMHSA On Revised Federal CCF • DB Rev.CL 011510.Doc