

From: Rick Tennant
Sent: Tuesday, January 19, 2010 12:40 AM
To: LoDico, Charles P. (SAMHSA/CSAP)
Subject: Electronic CCF for Federal and DOT collections

Mr. Lodico,

I appreciate the opportunity to write in to SAMHSA on this important issue. I have been in the drug testing industry since 1995, it has been a fun and rewarding career. I have worked in a variety of different capacities in this industry. Starting as a Collector, then taking a job with a TPA and now today, the majority of my business is Medical Review. I have watched many changes take place in drug testing, some good, while others....well they happened regardless of my thoughts. Which leads me to this email.

I am happy to speak on behalf of using an electronic CCF for drug screen collections. I started in this industry as an independent collector in 1995. I averaged over 200 tests a month for almost three years. During this time, I kept track of my tests using excel spreadsheets and backing those up with hard copy three ring binders. I carried in the back of my truck and on my backseat, boxes and boxes of kits, forms and other supplies. At that time, I utilized technology the best I could, cell phones, pagers, fax machines and txt messaging. The five part form for DOT (and Non-DOT at the time) was the "gold standard". It made sense and it worked back then.

Early in my career, I remember sitting in a meeting with a well respected MRO, a well positioned TPA, a nationally known SAMHSA certified Lab, and two large Clients. The goal of the meeting was to create a better testing program for these two clients. This was a brain storming meeting. The first thing the MRO said was something to the affect that he was a "product of the U.S. Government". This statement made people laugh and started the meeting off well. His second statement stung me. He said, "the collectors are the weakest link in the drug testing process!" I was taken back and offended because I took my job very serious. Though it is not a difficult job, it is important. I thought my peers took the job as serious as I did. I was naive. I was sheltered, and he was right. He talked about how the labs "buckled down" and did things "better" and watched all areas of their operation in an effort to offer a better service and to protect against scrutiny. He talked about his role changing to make the process better for both the donor and the client. Then he reiterated what he said about the collectors and basically likened us to a bunch of wild west gunmen that did what we wanted, as we wanted in the belief someone else would fix any problems we created. To a large degree he was right and the year was 1998.

I think that most collectors understand their position and their responsibility. I think they take their job serious and do the best they can most of the time. I also know that the collector is the first point of contact and the initiator in the specimen process. This is a vital role and one that should not be left without some degree of accountability and resources. Electronic Custody and Control Forms offer both assistance/support to remind collectors to do things the correct way. It also affords the collector the accountability to do their jobs more accurately than using the paper forms.

This is the main reason why I believe the electronic CCF makes sense. To break it down. First, the technology is there, and getting better every day. Secondly, electronic cuts down on errors and misreads. For example, my #4's look like 9's and vice versa. Using a keyboard avoids that judgment call by the accessioner. This alone will save time and money for all sides of the test and keep data more accurate, thus maintaining the integrity of the sample. Thirdly, it allows for easier form distribution and retention and lastly, it is time. We can do it and it is necessary to move this piece of the industry forward.

I have trained hundreds of people in my career. I have come back to visit and found them doing things so far out of the standard that it makes me worry. These are good collectors, but left to themselves and not dealing with every "what if" scenario every day, opens doors for interpretation and errors.

As a Medical Review Office, we see errors each day that can be avoided with the checks and balances that exist in the current Non-DOT versions of the electronic CCF. Examples include: Collectors forgetting to mark the temperature box, all the way to not collecting a second sample under direct observation when the donor presents a temperature that is out of range.

We as an industry have spent time and resources to make the lab analysis better, the MRO better, the company policies better, the DOT regulations in 2001 better. I think allowing the use of electronic custody and control forms will assist in making "the weakest link in the drug testing process" better.

Thank you for taking the time to read my comments. If you have any questions or would like further information feel free to contact me. My office line is 888-249-4575.

Respectfully,

Rick J. Tennant
Vice-President, Operations
Workforce QA