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Reply to Attention of MCHL-UDL

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SUBJECT: Proposed Revisions to the Federal Custody and Control Form (OMB No. 0930-0158)

1. I would like to express support for the inclusion of language within and governing the use of the Federal Drug Testing Custody and Control Form (OMS No. 0930-0158) that would permit the use of collection-site-generated forms from a web-based provider. Although any involvement in the use of these forms is limited only to participation in a small feasibility study of qc samples, it is quite clear that this approach holds many advantages over the current system of pre-printed, multi-part forms in terms of the laboratory imperatives of accuracy, speed/efficiency, and cost. Indeed, in my view, this technology offers the rare opportunity of simultaneous significant improvement in all three aspects.
2. From the standpoint of accuracy, the forms we have seen are uniformly clean, free of defects and consistently arranged, as opposed to the pre-printed forms which vary markedly in appearance, arrangement, and data-type (hand-written vs pre-printed, with/without barcode), so as to facilitate the accurate capture of data elements.
3. Additionally there is every reason to believe that automatic pre-loading of standard or extra-site-determined, e.g. test basis, elements, will result in fewer errors in the completion of the form at the collection site.
4. The improved fidelity of site-generated forms, described above, also facilitates improved efficiency, especially at the log-in step, in the decreased amount of time deciphering marred, illegible, or oddly-placed data elements. Also, this technology offers the possibility of direct downloading of pre-lab data elements directly into laboratory information systems, a capability that not only would markedly streamline the log-in process, but also eliminate lab hand key errors.

5. Although the relative upfront costs of pre-printed vs collection-site-generated forms are roughly comparable, the real time production of collection-site-generated forms has the inherent advantage of the elimination of wastage due to stockpiling of preprinted forms.

6. In my opinion, a web-based, collection-site-generated CCF is an inevitable step in the development of the Federal Drug Free Workplace Testing Program. It is also apparent that with respect to implementation, there is a definite chicken versus egg problem, i.e. we don't want to jeopardize regulated samples by collecting them on untested forms, but we can't really test the forms without testing some population of regulated samples. With respect to this conundrum, I would offer that the essential workability of the web-based system has been well demonstrated by extended, wide spread use in the non-regulated arena and that there is every reason to believe that the error-rate will be significantly less than the current system, and certainly no more, when implemented in the regulated arena. Based on these two premises, it would seem that language that would permit the use of web-based, collection-site generated forms, on some basis, would be appropriate at this time.

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