

KorManagement Services
Florence South Dakota 57235
<http://kormanagementservices.com/> (web page)

January 7, 2010

Robert L. Stephenson II, MPH
Division of Workplace Programs, CSAP
1 Choke Cherry Road
Rockville, MD 20857

Dear Mr. Stephenson,

My company has been training collectors on specimen collection for regulated and non-regulated workplace testing programs since 1998. I have been in the drug and alcohol industry since the beginning of drug testing back in the late 80's doing collection and training staff to do collections. Some concerns I have on the proposed CCF are:

- There is no verification box of the donor's ID on step one
- It doesn't expand on who will be allowed to mark the agency under step one. Will the completion of step one be preprinted as before.
- Clarification on Step 1D – if not completed will it be a fatal flaw?
- Will the print quality be improved? Many times when transmitted now the MRO and employer copy is illegible.
- What about other mechanisms to use other than pre-printing new CCF's?
 - 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. This is new technology will improve the collector's ability to strictly follow collection site guidelines and 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, which ensures more reliable and timely routing and distribution of results and CCF copies.
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 - Software systems provide vastly improved record-keeping tools and access to historical information than paper-based filing systems.
 - Since most non-regulated testing is rapidly moving to this newer technology. Mandating a form that prohibits the use of this technology will require collection

sites to maintain separate processes for procedures, training, and record-keeping.

Thank you for the opportunity to participate in the rule-making process and for taking these comments into consideration on this important topic.

Sincerely,

Jan Kornmann, BS