Being a presidential election year, there's a lot of talk in the air about change. As Thomas Jefferson once said, “A little revolution now and again is a good thing.” Change does not come easily in the drug testing industry. Drug testing is a serious business, with serious consequences, which means that gains in efficiency take a back seat to maintaining the integrity of the process. Of all the things that have been long overdue for change, the multi-part custody and control form (CCF) tops the list. A typical interaction between a collector and donor quickly illustrates some of its shortcomings:

**Donor:** Hi, I’m here for my drug test.

**Collector:** DOT or non-DOT?

**Donor:** My name is Steve, not DOT.

**Collector:** Whatever. What company are you with?

**Donor:** I work for ABC Trucking, but I’m trying to get a job with Super Quickie Mart

**Collector:** Did you bring in your chain of custody form?

**Donor:** I don’t know what kind of place this is, but no one said anything about chains. And how did you know I’m behind on child support?

**Collector:** Let’s just do your test, but I need to know if you’re a driver.

**Donor:** How do you think I got here?

This type of interaction goes on as many as 100,000 times every day in the United States. We live in a world that has been overtaken with software at the gas pump, the grocery store or the airport, but our industry’s paper-based chain of custody process has remained untouched for 20 years. While there’s no shortage of ideas on how to revamp the current CCF model, with several initiatives already underway, their ultimate success or failure will be subject to our industry’s conservative approach to change.

### Good change = Collaboration

During my 20 years in the drug testing industry, I’ve witnessed firsthand several changes that can be described as revolutionary. Perhaps most significant was the adoption of a standardized DOT CCF. In the early nineties, prior to the Omnibus Transportation Safety Act, there were more than 100 certified labs. Each had developed their own version of an “ideal” CCF to accommodate their customers’ needs. The variety of forms stocked at collection sites in those days was truly amazing and confusing. The US Department of Transportation (DOT) was the driving force of the drug testing industry, and regulators knew that compliance could only be achieved through standardization. It didn’t take long for the DOT to mandate a standard CCF format, designed with industry input. While their original 7-part contraption was the pinnacle of CCF madness, the DOT proved that it was possible for laboratories to adopt a common CCF format.

Significant changes like this illustrate the importance of industry-wide collaboration and participation. Without compromise, superseding federal certification would still be a dream and collectors and MROs would still be dealing with dozens of different DOT CCF formats.

For a brief period several years ago, it looked like the feds were going to lead the charge on making the CCF friendly with the digital world. But with that initiative on the back burner, and considering that 80% of all testing activity falls outside the reach of federal requirements, any truly beneficial change to the CCF will have to be industry-driven. For a new CCF model to succeed without federal mandate, it will require compromise and participation from the industry as a whole. Without collaboration and compromise, collection sites may soon face a digital version of the CCF smorgasboard from the early nineties, requiring collectors to log into different vendor-specific applications for each donor.

### It’s about more than saving paper

It’s true that the multi-part CCF model burns up an enormous amount of paper. In fact, the industry purchases over 100 million forms each year in order to process approximately 40 million tests. But as much as we like to whine about unnecessary waste and expense, it’s important to recognize that the current CCF model has been very successful where it matters most—in court. A “chain of custody” is a document that establishes transfer of evidence from one party to another. It’s important in drug testing because samples get transferred from the collection site to the laboratory. The primary purpose of the CCF is to document chain of custody, a concept that has faded into the background of
the testing process today. So rather than throw the baby out with the bath water, we should pursue a digital CCF model that:

1) **maintains the forensic fortitude of the current forms;**
2) **reduces or eliminates the waste and inefficiencies;**
3) **improves data management and integrity;**
4) **AND works for the collectors!**

From a conceptual standpoint, it’s not that hard to do. The first step is to remove the data management burden from the CCF. When a sample arrives at a lab today and it’s logged into the lab’s computer system, its only required identity is a number. After the result is complete, it’s married up with its data once again and delivered to the intended party. In fact, many labs have been “accessioning” samples at the collection site for years. If the collection site uses a data system that is compatible with the requirements of the laboratory data system, account-specific CCFs can be printed on-demand, greatly reducing the waste of pre-printed forms.

Our industry has an additional, and extremely important, characteristic. The vast majority of collection sites ARE NOT exclusive to specific laboratories. Most are performing procedures for more than a dozen different labs and for hundreds of different employer and service provider accounts. If the industry wishes to continue sharing collection sites, a “shared” collection site data management system is the only logical way to go.

A shared system can meet all of the criteria, instead of just some, because it works for collectors. With the information technology available to us today, it is possible for labs, MROs, service providers, and employers to build whatever systems they want for ordering tests, finding collection sites and managing results. Sharing test transaction data with a neutral collection data management system is straightforward and valuable to the industry as a whole. Software does a much better job than paper forms at enforcing procedures and a common software platform is much easier to administer and learn than forcing collectors to become proficient with several different applications.

FormFox is an exciting new application for collection sites that has what is required to revolutionize the CCF. FormFox is a “neutral” software application that is capable of supporting any collection or instant test procedure. Its participants can feed the system their CCF requirements, such as employer and MRO data. FormFox also employs a unique CCF that is a single-sheet, laser printed document that has an integrated donor receipt and security seals for urine, hair, oral fluid, instant cups, and blood tubes. The FormFox CCF also includes a factory printed form ID that is duplicated on the donor receipt and security seals, which maintains the same chain of custody methodology of existing multipart forms. It also allows collectors to perform collections “off-line” if they lose internet connectivity or if they need to travel on-site to perform collections.

FormFox is designed as a platform for industry collaboration and participation. It’s the right solution at the right time. It maintains the forensic strength of our existing CCF model while providing a standard environment for collection sites. It will provide the maximum cost savings possible to the industry by using a standardized CCF stock for non-regulated testing. As a neutral platform, all industry players can take advantage of the improved data management and integrity made possible by getting collection sites online. And perhaps most of all, FormFox works for collectors. The only successful model for getting collectors online is one that allows collectors to service ALL their customers within a common application environment.

Every significant change for the better in our industry has been the result of compromise and participation. If we want to receive the benefits of getting collection sites online, the industry will have to collaborate in the area where it already shares the most: independent collection sites. Reducing waste while improving efficiency, data integrity, and collector performance- that’s a change that gets my vote!

**FormFox – Reduce paperwork. Eliminate Errors. Standardize forms. Learn how easy it is to get set up! It’s quick and it’s FREE! Call today! (877) 376-3691 or email at support@formfox.com.**