



July 30, 2020

Substance Abuse and Mental Health Services Administration
5600 Fishers Lane
Rockville, MD 20857

Via OMB Docket at: www.reginfo.gov/public/do/PRAMain

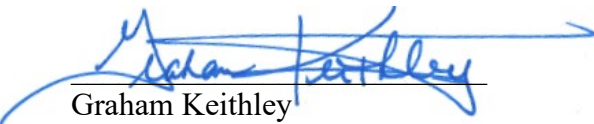
Re: Comment to SAMHSA's Agency Information Collection: Mandatory Guidelines for Federal Workplace Drug Testing Programs (OMB Control No. 0930-0158)—Revision

To Whom It May Concern:

Airlines for America (A4A), on behalf of its members,¹ appreciates the opportunity to provide comments regarding the Substance Abuse and Mental Health Services Administration's (SAMHSA) Agency Information Collection: Mandatory Guidelines for Federal Workplace Drug Testing Programs—Revision.²

SAMHSA proposes removing the instructions for completing the CCF from the back of the form and posting instructions on SAMHSA's website.³ However, the Department of Transportation's (DOT) rules governing procedures for transportation workplace drug and alcohol testing programs state that the specimen collector must take the following steps before actually beginning a collection: "Explain the basic collection procedure to the employee, including *showing the employee the instructions on the back of the CCF*."⁴ Accordingly, collectors will not be able to comply with DOT's rules if SAMHSA removes the instructions from the CCF. Therefore, we urge SAMHSA and DOT to address and resolve this conflict before publishing the revised CCF.

Respectfully submitted,



Graham Keithley
Assistant General Counsel
AIRLINES FOR AMERICA

cc: DOT, Office of Drug & Alcohol Policy & Compliance, ODAPCWebMail@dot.gov

¹ A4A's members are Alaska Airlines, Inc.; American Airlines Group, Inc.; Atlas Air, Inc.; Delta Air Lines; Federal Express Corp.; Hawaiian Airlines; JetBlue Airways Corp.; Southwest Airlines Co.; United Continental Holdings, Inc.; and United Parcel Service Co. Air Canada is an associate member.

² SAMHSA, Agency Information Collection: Mandatory Guidelines for Federal Workplace Drug Testing Programs—Revision, 85 Fed. Reg. 34,456, at 39,204 (June 30, 2020).

³ *Id.* at 39,205 ("Removed Instructions for Completing the CCF from the back. SAMHSA will post instructions for completing the Federal CCF for urine and oral fluid on their website.").

⁴ 49 C.F.R. § 40.61(e) (emphasis added).