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The Honorable Pete Buttigieg  
Secretary  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC 20590

**RE: Docket No. DOT-OST-2022-0027, Electronic Signatures, Forms and Storage for Drug and Alcohol Testing Records**

Dear Secretary Buttigieg,

On behalf of the American College of Occupational and Environmental Medicine (ACOEM), I am writing to express strong support for the U.S. Department of Transportation's (DOT) Notice of proposed rulemaking "Electronic Signatures, Forms, and Storage for Drug and Alcohol Testing Records" [Docket No. DOT-OST-2022-0027].

Founded in 1916, ACOEM is the nation's largest medical society dedicated to promoting worker health through preventive medicine, clinical care, research, and education. The College represents Occupational and Environmental Medicine (OEM) physicians and other healthcare professionals devoted to preventing and managing occupational and environmental injuries, illnesses, and exposures. Many of our OEM physician members serve as Medical Review Officers (MROs) under the Department of Transportation's drug testing program or Commercial Driver Medical Examiners under the Federal Motor Carrier Safety Administration's Medical Standards program.

We support the amendments proposed in the rulemaking to allow, but not require, electronic versions of forms, electronic signatures, and electronic means of storing data to be utilized in workplace drug and alcohol testing processes by the federally regulated transportation industry. Current DOT-regulated employers and their contractors must use traditional signatures and store paper documents unless they use an electronic system approved by the U.S. Department of Health and Human Services. These current process requirements are outdated and inefficient, especially considering standardized electronic processes used in related systems and platforms, such as electronic medical records.

We agree with the Department's assessment that this rulemaking will provide flexibility and reduce costs for the industry while modernizing alcohol and drug testing in a manner that preserves integrity and confidentiality requirements. We also agree that these proposed changes will help mitigate the longstanding problems (e.g., delays in processing times of test results, canceling of test results, etc.) associated with illegible and lost copies of paper documents.

We appreciate your consideration of these comments, and we look forward to collaborating with the DOT to carry out its mission of improving the safety of commercial motor vehicles and saving lives. If you have any questions or need additional information, please contact Dane Farrell ([Dane@cascadeassociates.net](mailto:Dane@cascadeassociates.net)), ACOEM's Government Affairs Representative.

Sincerely,

*Tanisha Taylor, MD, MPH*

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President  
American College of Occupational and Environmental Medicine (ACOEM)