Procedure: Initiating and Maintaining a Chain of Custody Document

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OBJECTIVE

This protocol provides a standard operating procedure (SOP) for initiating and maintaining a *Chain of Custody* (COC) document. A COC is necessary for documentation of the possession of samples suspected of containing Select Agents. This document serves both a legal purpose and helps to ensure the integrity of suspect Select Agent samples.

POLICY

This procedure should be strictly adhered by all entities, internal or external, that send suspected Select Agent samples to the City of Houston Department of Health and Human Services (HDHHS), Bureau of Laboratory Services (BLS) for testing or rule out. A COC must be initiated by the Sample Collector and maintained by all who transport and/or receive the sample. This legal document helps to ensure that the integrity of the sample is preserved, from collection to analysis, to destruction, or further transport. All lab personnel should become very familiar with this SOP.

DEFINITIONS

**Chain of Custody (COC)** – a written legal document used to track the transfer of a sample(s) from person to person.

**Sample Collector** - in the case of an environmental sample, this would be the emergency personnel (e.g., Hazmat) collecting the sample; for clinical samples sent from sentinel labs, this would be the person forwarding the sample to a Laboratory Response Network (LRN) reference lab (e.g., HDHHS, BLS).

**Sample Courier/Operator** – the person responsible for transporting the sample from the Sample Collector to the Sample Custodian.

**Sample Custodian** – the person who receives the sample (e.g., HDHHS lab personnel), and has demonstrated competency in handling of samples and maintaining a COC.
PROCEDURE

A. Creating a COC

An electronic copy of the COC preferred for use by the HDHHS lab can be found at the HDHHS, BLS Website for The City of Houston at:

http://www.houstontx.gov/health/Lab/index.html

A different COC may be used as long as it contains the following information:

- The words “Chain of Custody” must be located in a conspicuous location at the top of the document.
- The first field of information must include an Agency Identifier/Number. This number must match the number located on the sample.
- An information line for the date, time, phone number, printed name of Sample Collector, signature of Sample Collector, organization name (no acronyms), organization’s full mailing address, and sample description must also be included in this first information field.
- Subsequent fields must be provided to allow for documentation of information about any subsequent Sample Couriers/Operators or Sample Custodians. These fields must contain the date, time, phone number, printed name of person taking custody of sample, signature of person taking custody of sample and organization name (no acronyms). Additional information may be supplied but is not required.

B. Completing and Maintaining a COC

Once a sample has been determined to require a COC, the Sample Collector must initiate the COC. The Sample Collector is required to either use his/her entity’s own COC or download the one provided by the City of Houston. The Sample Collector must fill in the first field provided on the COC using an ink pen (Note: using a pencil is not acceptable). The “Agency Identifier/Number” must be included and must match the number on the sample (this will generally be the case# for an environmental sample, or the patient’s medical record# for a clinical specimen). The “Date” and “Time” must be filled out to reflect the actual time of collection. Include the Sample Collector’s phone number under the section titled “Phone.” Under “Collected/Delivered By,” the name (printed) and signature of the Sample Collector is required. The “Organization” line must include the FULL name of the organization without acronyms. Under the “Complete Address” line, include the full mailing address of the organization. Finally, under the “Specimen Description,” include a brief description of how the sample is being transported (e.g., agar slant, blood vial).

Any person subsequently receiving or transporting the specimen must fill out a subsequent field of the COC. For example, the second person to take custody of a
sample should complete the second field of the COC; the third person should complete the third field. This should continue for all subsequent Sample Couriers/Operators or Sample Custodians.

The “Date” and “Time” must reflect the PRECISE time and date at which custody was transferred from the previous person to the new person. It is important to note that this information relieves the previous person from custody. Therefore, it is essential that the Sample Custodian note this date and time as precisely as possible. Include the new Sample Custodian’s phone number under the “Phone” space provided. Under “Received By,” include the new Sample Custodian’s name (printed) and signature. Under “Organization,” include without acronyms the organization represented by the new Sample Custodian.

In general, a sample requiring a COC will follow a path as follows:

Sample Collector -> Sample Courier/Operator -> Sample Custodian

However, it is important to note that anyone who receives or transports a suspect Select Agent must complete the appropriate section(s) of the COC.

COC documents are safely secured and stored within the HDHHS, BLS.