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Walter F. Vogl, Ph.D.
Drug Testing Section
Division of Workplace Programs
SCAP
5600 Fishers Lane
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Rockville, MD 20857

REFERENCE: SAMSHA VOLUME 69, NUMBER 71 FEDERAL REGISTER

Mr. Vogl,

I am writing this note of congratulations and support for SAMSHA's decision to include hair testing as an approved method for detecting substance abuse.

I further understand that SAMSHA has made the decision to limit the hair collection process to "head hair only" for fear that the collection from other parts of the body may be viewed as too invasive. While your decision to incorporate hair testing as an acceptable procedure is outstanding, I would encourage you to reconsider the limitation on collection sites.

Our company has been using hair testing since 1987, and have collected thousands of samples from individuals without complaint. While I understand your reluctance to collect pubic hair, I would encourage you to consider allowing the collection of hair from other parts of the body as acceptable; i.e. under-arm, back or chest, etc. I truly believe you offer an opportunity to avoid detection by some should you decide to use only head hair.

Thank you for making the decision to use hair analysis. I am confident you are taking a major step in making our communities safer.

Sincerely,

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Joseph Wiltrakıs
Director of Corporate Security

Steelcase Inc.