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From: "lab" <lab@drpblereau.com>
To: <wvogl@samhsa.gov>
Date: 6/7/2004 2:32 PM
Subject: SAMHSA's proposed rewrite of the Mandoatory Guidelines

Comments concerning the proposed rewrite of the Mandatory Guidelines for DOT Part 40

MRO Update, March 2004, pages 4-6, "Reporting of Results from Paired Collections."

MRO Update, May 2004, page 5, "Collectors already struggle with doing urine collections properly."

MRO Alert, October 2003, page 6, "Bob and Donna's Horrible Adventure."

These are a few articles that indicate problems with drug collectors and drug collections. There exists a set of rules that collectors are to follow but I would be surprised if a majority of collection facility personnel have access to them or even know they exist.

Collectors do not even know the basic steps in collecting a drug specimen. Donors are called off their jobs and are not allowed to wash their hands before a collection (much less required); and don't think you can question the collector about the procedure because you will be labeled a troublemaker. This has happened to a member of my family just as Bob and Donna experienced the misdeeds of their urine collection. Why are there no gate keepers to monitor these collectors when you are dealing with someones livelihood? You cannot get a collector to indicate on the form if a second, witnessed, specimen is to follow. These collectors cannot follow instructions: how do you expect these same people to perform poc testing or to collect different specimen types when needed?

It took many years to reach our present status with urine drug testing. Mistakes were made, donors careers were destroyed, law suits had to be filed to prove the chemistry was different than what was legislated. Technology will change and move forward, but we should make sure that the chemistry is correct before we approve any new methods. Until statements of science are proven fact, I do not find that it is in the donors best interest to approve new methodology at this time. Lobbyists should not be making these decisions, scientists should.

Lynnell Hanson, MT(ASCP), MHS
Plaquemine, LA