FR Doc #04-7984 PUBLIC COMMENT 8400033

From: "Bella Kleinman" <compplus@fuse.net>

To: <wvogl@samhsa.gov>
Date: 6/24/04 6:45PM

Subject: new guidelines for alternative testing

I think that alternative testing is not the way to go. The "instant urine tests and saliva tests" are very subjective and the prelimnary results are no longer private and anonymous. Hair tests may reveal that an individual used an illegal substance "3" months ago, but does not reveal his/her current status. Would the driver have to go to a SAP if he had already undergone treatment?

Patch tests will not give an employer the results for over 1 week. It is up to the collector to determine if there was any tampering with the patch.

The present system of testing for DOT works very well and and is standardized throughout the industry. There are thousands of collectors and even if you spell out every little process, you will have more errors. If a facility does 3-4 types of testing, they have to have someone trained on duty at all times to be able to provide the correct test to each company. The cost of additional training is expensive for many medical facilities and not worth it for them to continue to do collections. It also opens them to additional liability. If there is to be secure storage for the alternative tests, to be kept for 1-5 years, many facilities are not equipped to do so.

Will a company be able to rely on the comparibility of the results of the tests if one driver has a saliva test and another has a patch or hair test?

My feeling is that if it isn't broke, don't fix it. A lot more study and research should be done before the alternative testing, especially before required for the DOT.

Bella

Compliance Plus