

From: "Dickson, Stuart" <Stuart.Dickson@esr.cri.nz>
To: "wvogl@samhsa.gov" <wvogl@samhsa.gov>
Date: 7/5/04 5:40PM
Subject: SAMHSA Guidelines. Docket#04-7984

> TO WHOM IT MAY CONCERN

>

> Thank you for the opportunity to comment on the proposed SAMHSA Federal
> Drug Free Workplace Guidelines. The Institute of Environmental Science and
> Research Limited (ESR) provides forensic science services to the New
> Zealand Police and a range of other services including workplace drug
> testing to a wide range of clients. ESR has representation on the
> Committee responsible for developing and amending the Australian/ New
> Zealand Standard AS/NZS 4308:2001 "Procedures for the Collection,
> Detection and Quantitation of Drugs of Abuse in Urine". We would like to
> comment on several issues raised in the guidelines specifically as they
> relate to oral fluid testing.

>

> 1. In our view the guidelines are unnecessarily wordy and could be greatly
> improved by separating the requirements for the different matrices into
> separate sections ie Urine, Oral Fluids, Sweat etc.

>

> 2. The requirement that oral fluid be collected by spitting in a tube is
> unnecessarily crude and unsanitary. Certainly it would seem premature to
> exclude (or include) the alternative collection devices and tubes with
> diluent on the market, some of which may provide superior sample
> collection and storage. It would be more appropriate to establish criteria
> that all collection tubes and devices should meet. These should include
> the following:

> (1) limits for the fraction of drug(s) lost on the collection device
> (2) the stability of drugs in oral fluid stored in the collection tube
> at say room temperature and 4 degrees C. This should apply whether or not
> the specimen has been placed in a diluent.
> (3) the ease of specimen splitting. This is of concern as particulate
> matter should be eliminated prior to specimen splitting. The proposed
> guidelines have not addressed this point.
> (4) the volume of oral fluid collected should be determined by
> analytical requirements. The guidelines stipulate that at least 2 mL of
> oral fluid be collected. This seems well in excess of the requirements of
> a competent laboratory and greatly in excess of the volume collected by
> many systems currently on the market.

>

> 3. The proposed guidelines require a urine specimen be collected at the
> same time as an oral fluid specimen. Such a proposal would essentially
> eliminate oral fluid as an option. Indeed one could reverse the argument
> and suggest that when an unwitnessed urine specimen is collected an oral
> fluid specimen should also be collected. The question of environmental
> contamination of oral fluids (by THC) however does not seem to be strongly
> supported by good evidence and further work is required.

> Oral fluid testing in its own right should be permitted by the guidelines
> but only once it is supported by the weight of scientific evidence. While
> an extensive study by Cone et al. in The Journal of Analytical Toxicology
> 26 541-546 (2002) demonstrates similar positive drug test results for oral
> fluid and urine specimens, it is our view that it is premature to include
> oral fluid testing in the guidelines. Certainly it was the general
> consensus at the November meeting of The International Association of

> Forensic Toxicologists that oral fluid testing was not yet ready to roll
> out. It would therefore seem advisable to at least wait for the results of
> the Rosita II study to become available at the end of 2005.

>
> Yours sincerely,
> Dr Stuart Dickson,
> Science Leader,
> Forensic Toxicology.

>
>
>

+++++

WARNING: This email and any attachments may be confidential and/or privileged. They are intended for the addressee only and are not to be read, used, copied or disseminated by anyone receiving them in error. If you are not the intended recipient, please notify the sender by return email and delete this message and any attachments. The views expressed in this email are those of the sender and do not necessarily reflect the official views of the Institute of Environmental Science & Research Limited (ESR).

The recipient of this e-mail should be aware that this e-mail and any attachments to it has been scanned before despatch but that it might not be free from viruses in their various forms. ESR strongly recommends that the recipient uses anti-virus software to screen all e-mails received externally. ESR does not accept any liability for any loss or damage that may occur as a result of the transmission of this e-mail to the recipient.

Institute of Environmental Science & Research Limited
<http://www.esr.cri.nz>

+++++