FR 200#04-7984 PUBLIC COMMENT 8400068

From:

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To:

<wvogl@samhsa.gov>

Date:

7/6/04 4:50PM

Subject:

Public Comment on FR DOCKET NUMBER 04-7984, Mandatory Guidlines

Dir Sir, I'm writing to ask that SAMHSA make changes to its proposed drug testing guidlines because, as written, they disciminate against individuals who suffer from paruresis, commonly known as shy bladder syndrom. An inability to produce a specimen should never be equated with a refusal to test.

SAMHSA needs to do away with the 3 hour 40 ounce rule because it could be construed as a barbaric torture to those who suffer from severe forms of paruresis. Instead, SAMHSA must mandate the use of tests such as oral fluid, sweat, hair, or blood, for any job applicant or employee who claims to suffer from paruresis, or who simply wishes to provide a specimen other than urine.

Thank you for your concern.

Chad Grandy

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