8400222

From:"James Hergert" <jhergert@comcast.net>To:<wvogl@samhsa.gov>Date:7/8/04 9:51PMSubject:Public Comment on FR DOCKET NUMBER 04-Mandatory Guidelines

Public Comment on FR DOCKET NUMBER 04-Mandatory Guidelines

I understand that you are accepting comments on SAMHSA regulations on employment drug testing. urge you to include reasonable accommodation for those of us who have paruresis (shy bladder) and other disorders that affect urination.

As an individual with paruresis, I find it difficult, if not impossible, to urinate in a public restroom, with others nearby, or when expected to produce a urine sample on demand. I have no issue with drug testing per se. I support the notion that we need to combat drug usage in the workplace, especially in sensitive areas that affect the safety of others. I am concerned, however, with any regulations that would limit the testing to a single method under which I, along with many others, would not be able to comply.

My current job does not require drug testing. I realize, however, that could change. I could be subject to a drug test were I to seek certain employment opportunities. Without reasonable accommodation, the test could be construed as discriminatory. Potentially, many other able, talented, and drug-free individuals would also face discrimination and be turned away as job candidates.

Please carefully assess the impacts of the regulations on those with paruresis. Thank you for any efforts you can pursue that would allow for reasonable accommodation.

James Hergert