REGARDING: FR DOC 04-7984

July 8, 2004

The proposed dug testing revisions do not meet the needs of those employees or covered persons who suffer from paruresis (shy bladder syndrome).

First, the distinction between "refusal" to provide a sample and "inability" to provide a sample of urine must be made clear.

Second, employees/covered persons must be allowed the option to provide an alternate sample, beit oral fluid, sweat, or hair.

Third, in the event that a second biological sample is required, employees/covered persons must be allowed to provide an alternate sample, beit oral fluid, sweat, or hair.

The validity and reliability of alternate samples is supported by hard science. See http://workplace.samhsa.gov/DrugTesting/comments/Public%20Comment%208400057.txt

Millions of US citizens suffer from paruresis and their disability should be meet with reasonable accommodation by the Federal Government.

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