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**Subject:** response to docket 04-7984

ATTN: SAMHSA re docket number 04-7984

As an academic scientist working in the area of saliva and oral-based diagnostics for over 15 years, I was dismayed upon reading the proposed revisions to the federal drug-free workplace guidelines. The concept of collecting an oral sample by spitting into a bottle is scientifically unsound, and could take the entire field of oral diagnostics back more than 25 years. As the organizer of a major symposium in 1993 (Saliva as a Diagnostic Fluid, NY Acad Sci 1993, volume 694) and currently involved with planning a second meeting on this topic, I was surprised by the lack of understanding presented in the guidelines.

Much of the supporting data regarding to oral testing of drugs of abuse was derived with specially designed collectors that provide a sample quite different from "spit". The field of oral-based diagnostic testing has evolved considerably, and in 2004 no serious studies are being carried out with a collection method as described in the guidelines. The oral cavity can be the source of many types of samples including saliva, gingival crevicular fluid, plaque, volatiles, buccal swabs, and oral mucosal transudate, to mention a few. The reason for using specialized collectors for testing ( for example, hormones, antibodies, DNA, drugs of abuse, or therapeutic drug monitoring) is to obtain a reproducible sample with the highest level of analyte, uncontaminated by bacterial or mammalian cells.

I would be pleased to go into further detail with members of the committee involved with drawing up new guidelines, but I must point out strongly that collecting spit in a bottle is not an acceptable approach at this time.