

From: Alison Thierry-Hunt
Sent: Friday, January 15, 2010 7:52 PM
To: LoDico, Charles P. (SAMHSA/CSAP)
Subject: Fw: Proposed changes to HHS drug testing

Dear Mr. Lodico:

I wanted to offer both support and express concerns regarding various aspects of the proposed changes to Federally Mandated drug testing. I share with you a perspective from two decades of experience, as both an educator and service agent.

While I think some of the changes to the CCF will serve to clarify test contacts, events and modes, the collectors will still be following the odd sequence of steps 1,2 3 5 (on copy 2) and back to 4 (on copy 1). Perhaps re-numbering was not even considered from the perspective of form completion by the collector? The numerical oddity, which shall remain in this proposed revision, does lead to some collectors to completely overlook step 5, on copy 2.

The rest of my comments surround the actual testing of the samples and the substances for which we test:

I am not sure of the rationale to expand testing to facilities who are not able to both screen and confirm. While this is not yet in the jurisdiction of DOT, we know generally DOT harmonizes their rule making with DHHS guidelines. When the chief purpose of drug testing is for public safety, both accuracy and timeliness are paramount. It would seem by allowing the screening to be done at one lab and then necessitating that non-negative sample to be forwarded to another lab for confirmation, this would delay the outcome of reporting many positives. This extra step in the testing pathway could delay results, which still must be reported to the MRO to initiate the interview and verification process. Where active-duty DOT tests are concerned, such as random test events, adding another day to the process (to ship the sample from the initial screening lab to the second lab for confirmation) is placing the public at further risk. In the spirit of safety,

In terms of adding the 'designer' drug panel component; MDMA, etc., in our office which provides Medical Review, we have not seen high incidents for these substances in non-regulated, workplace testing. What we know and perhaps, may be better served by looking at is for the inclusion of the synthetic opiates, e.g., Hydrocodone and Oxycodone. I believe this would necessitate Congress to amend the Drug Free Workplace legislation, to allow for the testing of these highly used and well known to be abused substances. In the spirit of safety, I do, however, support the consideration for lowering the cutoff level the substance - cocaine and its metabolite, benzoylecgonine.

I am interested to learn the outcome of these proposed changes.

You may contact me if you have any questions about the aforementioned comments.

Thank you for the opportunity to share my point of view.

Sincerely,

Alison Thierry-Hunt, MBAT, RCPCT
Allied Safety & Health