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**From:** "Judy Sims" <judysims@atestinc.com>  
**To:** <wvogl@samhsa.gov>  
**Date:** 6/28/04 1:47PM  
**Subject:** Alternative Testing Proposal

Hi Walt:

Please withdraw the Mandatory Guidelines and Proposed Revisions to Mandatory Guidelines for Federal Workplace Drug Testing Program. These changes will result in more expense, less qualified collection sites and collectors, tests that are not proven as reliable affecting employment, and general testing disarray.

Having been in this field of drug/alcohol testing as a TPA since 1989, I have seen hair and saliva testing issues that lead employers to be unsure on how to handle a positive hair test and a negative urine on a negative saliva and a positive urine. These things happen and cause major issues in a workplace. Additionally, trying to find collection sites with very skilled collectors has been difficult just attempting to teach the differences in DOT vs Non/DOT testing. They often use the wrong form, forget to do a split, and cannot understand the differences. Having more specimen options, more forms, and allowing them to make some decisions on alternatives will result in a complete disaster. There will be no financial savings for employers; actually, the fact is that the costs will increase substantially.

I support all the comments provided to you by Ken Edgell and hope you will agree that this proposed rule is not good for anyone.

Cordially,

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