

FR Doc # 04-7984

PUBLIC COMMENT 8400049

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To: <wvogl@samhsa.gov>
Date: 7/1/04 2:20PM
Subject: Hair Testing

As you know, SAMHSA has published in the Federal Register proposed guidelines for testing government employees using other matrices including hair. There is a 90 day public comment period that is quickly coming to an end July 12th. Proposed guidelines for hair testing restricts the sample to head hair only, excluding body hair as a sample because it is viewed as "too intrusive". If sufficient head is not present, urine testing would be the default test. If adopted, all a drug user would need to do is cut their head hair to less than 1/2 inch, and proceed with all the other methods to beat a urine test.

We (ATOFINA) currently are using hair testing for all our pre-employment tests and are in the process of setting things up to use it for some randoms. Of course these are non-DOT at this time. However with the ever growing drug problem in the US and the numerous ways people attempt to beat urine tests, hair tests is the way to go. I have in the past 12 years done hair testing with different employers and used other body hair such as chest hair, arms, in the few that required it.

Please consider all available ways to deter drug use in the workplace.

Thanks,
Betty

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