

P.C. 8400211

From: Bruce Renken <brucerenken@yahoo.com>
To: <wvogl@samhsa.gov>
Date: 7/8/04 4:49PM
Subject: Regarding Docket Number 04-7984

Re: Docket Number 04-7984

I have a condition known as paruresis, or shy bladder syndrome. An estimated 1-7% of the male population have this disorder, considered a social phobia in the Diagnostic and Statistic Manual of the American Psychiatric Association. Those who have it are unable to urinate in the presence of others. Those suffering from this disorder deserve a better deal than is available under present urine-only testing rules. We object to these rules, which equate inability to produce a specimen with refusal to test. Reliable alternatives to urine specimens are readily available and constitute reasonable accommodation as required under federal statutes protecting those with disabilities. SAMHSA needs to immediately mandate the use of alternative tests such as oral fluid, hair, or sweat patches for anyone who requests them, but especially those who suffer from shy bladder syndrome. Present rules improperly discriminate against those with paruresis in the job market.

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