



Drug and Alcohol Testing Industry Association
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Sean Belouin
Division of Workplace Programs
Center for Substance Abuse Prevention (CSAP)
SAMHSA
1 Choke Cherry Road
Room 7-1029
Rockville, MD 20850
Re: Mandatory Guidelines for Federal Workplace
Drug Testing Programs - Request for Information
Regarding Specific Issues Related to the Use of the
Hair Specimen for Drug Testing
Docket No. SAMHSA-2015-003

Following are the comments of the Drug & Alcohol Testing Industry Association (DATIA) on the SAMHSA Request for Information (RFI) regarding the use of hair testing within their workplace drug testing programs. DATIA is a 1,500+-member industry trade association representing the full spectrum of drug and alcohol testing providers including laboratories, collection sites, C/TPAs, BATs, MROs, SAPs, employers, and testing device manufacturers. DATIA's mission includes working closely with key policy makers in Federal Agencies and in Congress to ensure that the interests of the industry are heard and taken into account when changes in drug and alcohol testing rules are proposed. DATIA works to ensure that these changes foster rather than hinder the industry's growth, and provide for safe and effective drug free workplaces. DATIA further works to educate the industry on current standards of service and regulatory policies and procedures. DATIA's comments on behalf of its constituency are based upon input from DATIA's members, Legislative & Regulatory Committee, and Board of Directors.

DATIA supports initiatives to promote drug free workplaces thereby increasing workplace safety, and we applaud SAMHSA for beginning the process to develop guidelines that will allow hair testing within federally mandated drug-testing programs. Since the RFI is mainly geared around scientific laboratory protocols we are deferring to our member companies that perform such services to provide their information and studies concerning issues such as cutoff levels, washing procedures, validity testing, etc. The vast majority of hair testing laboratories are DATIA members, and we understand that there are differences between the processes for each laboratory so cannot comment as to the "one" process, cutoff level, etc. that is the best. Also, the Drug Testing Advisory Board has conducted many proficiency studies on hair testing so trust that they have the data needed to make

an initial determination on these topics. As such, our only comment on these issues are that DATIA feels that they need to be set to maximize safety, protect the integrity of the specimen, and not rely on any proprietary procedures/processes.

In regards to the RFI, DATIA would like to comment on some of the non-scientific portions.

- What are acceptable reasons for performing a hair test? DATIA feels that hair testing is only applicable for pre-employment and random testing, and in some instances return to duty testing. Since hair testing does test back for longer periods of time, it would not (a) definitively show recent drug use that could be a contributing factor in an accident, (b) definitively show recent drug use in the case of reasonable suspicion, or (c) show that a person has abstained from drug use during follow-up testing since the testing process starts very quickly after the initial positive. In regards to return to duty testing, DATIA feels that hair testing should only be allowed if the return to duty test is taken outside of the initial detection period (i.e. 90 day detection period and return to duty test is taken 100 days from the initial positive).
- What training should a collector receive prior to collection the hair specimen? We believe that the training requirements currently in place should apply to collectors that collect hair specimens as well. In addition, they need to receive documentation that they have received training (most of which is online via the many hair testing laboratories) on the specific hair testing collection methods including where to collect the specimen from, size of sample, preparing for shipment, etc.

DATIA thanks SAMHSA for the opportunity to provide input on the RFI. Please feel free to contact me if you would like to further discuss any of the preceding comments.

Sincerely,

A handwritten signature in black ink that reads "Laura E. Shelton". The signature is written in a cursive, flowing style.

Laura Shelton
Executive Director