



July 13, 2015

Substance Abuse and Mental Health Service Administration
Division of Workplace Programs (DWP),
1 Choke Cherry Rd., Room 7-1045,
Rockville, MD 20850.

Re: Mandatory Guidelines for Federal Workplace Drug Testing Programs; Notice Oral Fluid Specimens
SAMHSA-2015-0001-0001

Dear Docket Officer:

Thank you for allowing the National Safety Council (NSC) the opportunity to comment on the proposed changes to Mandatory Guidelines for the Federal Workplace Drug Testing Program; Notice Oral Fluid Specimens. NSC commends the Department of Health and Human Services (HHS) and its staff for their exemplary efforts in drafting the revisions to these guidelines.

The Council is a 100 year-old Congressionally chartered nonprofit safety organization dedicated to saving lives by preventing injuries and deaths at work, in homes, in communities and on the roads through leadership, research, education, and advocacy. Our more than 13,600 member companies represent nearly 8 million employees at more than 53,000 U.S. worksites.

NSC supports the proposed change to allow the testing of oral fluid samples as an alternative to urine in federal workplace drug testing program. This option provides greater flexibility for employers and allows them to update their drug testing programs to reflect improvements and advances in testing methods.

The Council is very pleased that hydrocodone, hydromorphone, oxycodone and oxymorphone are included in the proposed oral fluid drug testing panel. This change is a major advance in our Nation's efforts to effectively address the misuse and abuse of opioid painkillers. The misuse and abuse of opioid painkillers is a public health crisis contributing to more than 16,000 deaths annually and drug abuse and misuse by more than 6.8 million people in the past month. The addition of these opioid painkillers to the testing panel will help identify workers misusing these drugs and improve both workplace and public safety.

Section 3.4 Proposed list of analytes and cutoff concentrations

NSC fully supports the list of analytes, especially the inclusion of hydromorphone, oxycodone and oxymorphone that are proposed for the oral fluid testing panel. The Council finds that the proposed initial and confirmatory cutoff concentrations described in Section 3.4 are consistent with consensus recommendations made by experts and members of NSC Alcohol, Drugs and Impairment Division in a report "Recommendations for Toxicological Investigation of Drug-Impaired Driving and Motor Vehicle Fatalities" published in the Journal of Analytical Toxicology.

Section 7 Oral Fluid Collection Devices

NSC believes that an HHS published list of FDA approved collection devices would be beneficial for federal agencies and employers. The published list would make it easier for employers to utilize approved collection devices and maintain the highest standards in their workplace drug testing program.



Conclusions

Oral fluid testing provides greater flexibility for employers and allows them to update their drug testing programs to reflect improvements and advances in testing methods. NSC is pleased to see opioid painkillers included in the proposed oral fluid testing panel. The proposed changes will greatly enhance workplace and public safety. The Federal government plays a tremendous role in raising the bar for many private sector employers as they develop and refine their workplace drug testing programs.

Again, thank you for affording the NSC the opportunity to comment on the proposed changes to the Federal Workplace Drug Testing Program.

Sincerely,

A handwritten signature in black ink, appearing to read "DAPH", with a long horizontal flourish extending to the right.

Deborah A. P. Hersman
President & CEO