



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: Proposed Changes to Mandatory Guidelines for Federal Workplace Drug Testing Program Urine Testing  
SAMHSA-2015-0002-0001

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 Urine Testing. 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.

The proposed change to include hydrocodone, hydromorphone, oxycodone and oxymorphone to the federal workplace drug testing panel 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 addition of hydrocodone, hydromorphone, oxycodone and oxymorphone analytes to the urine testing panel as well as the proposed initial and confirmatory cutoff concentrations described in Section 3.4.

#### **Section 13.1 Proposed requirements for Medical Review Officers (MRO) requalification training and reexamination**

NSC agrees with the proposal to standardize the interval for MRO requalification and reexamination to five years. The Council does not believe it is necessary to require MROs to seek additional continuing education during five-year time intervals between requalification.

#### **Section 13.3 Proposed changes MRO training curriculum**

NSC concurs with the expansion of MRO training curriculum to provide more guidance on interpreting positive drug test results from prescription medications. Although not specifically mentioned, the Council also believes it is important that MRO training curriculum provide additional guidance on when and how to report safety concerns to employers when prescription and over-the-counter medications or dangerous



combinations of these medications may negatively affect duty performance. NSC is willing to work with HHS to develop procedures related to reporting of safety concerns regarding medication usage.

NSC supports the requirement to include information about how to discuss substance misuse and abuse and to access those services. We are hopeful that this type of information could motivate identified individuals to seek assistance. Research indicates that employer supported and monitored treatment yields better sustained recovery rates than treatment initiated at the request of friends and family members.<sup>1</sup>

### **Conclusions**

NSC is pleased to see opioid painkillers added to the urine testing panel and the thoughtful attention paid to ensuring that MROs have the necessary training to effectively determine the legitimacy of a valid prescription and the knowledge to make appropriate referrals to treatment for those workers identified as potentially misusing these drugs. 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 "D. Hersman", with a long horizontal flourish extending to the right.

Deborah A. P. Hersman  
President & CEO

---

<sup>1</sup> Weisner C, Lu Y, Hinman A, Monahan J, Bonnie RJ, Moore CD, Chi FW, Appelbaum B (2009) Substance use, symptoms, and employment outcomes of persons with a workplace mandate for chemical dependency treatment. *Psychiatric Services*, 60(5), 646-654.