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Date: 5/12/2004 1:41 PM
Subject: Hair Drug Screen

I understand that you are considering incorporating into SAMSHA the policy that head hair samples only are acceptable for hair drug screens. Body hair will not be acceptable for hair drug screen.

I strongly disagree.

When employers have a strong policy of keeping substances abusers out of their work place, a SAMSHA policy of "head hair only" will encourage denying employment to certain minorities and religious groups that encourage or mandate a shaved head.

With preplacement urine drug screens across our corporation, we rarely have a positive urine drug screen

Upon implementing hair drug screens we have had a consistent 10% positive rate across our corporation. Clearly, with urine drug screens, we have unknowingly been hiring substance abusers (10% of hires) into our corporation.

Having collected many hair drug screens, I have encountered many young blacks applying for work with our company that have volunteeringly shaved their heads. In these cases we used body hair and **no one** has objected.

Since our corporation has a strong commitment to safety and a policy to keep substance abusers out of our employment, it is imperative that body hair be allowed for hair drug screens.

Collecting body hair in an appropriate setting is no more an invasion of privacy than the collection of urine for drug screens purposes. Requiring "head hair only" is an invasion of the right to work.

If a head hair only policy is adopted by SAMSHA, then common sense dictates that substance abusers (particularly males) will shave their heads, knowing that even with a DOT urine drug screen policy, they can beat the system.

Suggestion: Drug screen those in your department that advocate the "head hair only" policy. You will be surprised.

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