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Alcohol- and Drug-Free Mines: Policy, Prohibitions, Testing, Training, and Assistance

Comment On: MSHA-2008-0011-0001

Alcohol- and Drug-Free Mines: Policy, Prohibitions, Testing, Training, and Assistance

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Comment from B. Lorraine Stuart, SAP

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General Comment

This comment is about the proposed direct observation rule.

As a person who has been working in the field of addiction for over 20 years I think that direct observation is the most effective method of obtaining urine specimens that have not been tampered with prior to submission. It is necessary to keep in mind that the public needs to be protected from individuals who are willing to drive while under the influence of whatever the favorite drug is at the time.

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