Hunterdon Central Regional High School

NJ's FIRST STAR SCHOOL HCRHS

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New Jersey State Board of Education
Public Testimony

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Hunterdon Central Regional High School has been involved with student random drug testing since September 1997. For the past 11 years, our district has facilitated a fair, well controlled and regulated process for specimen collection on-site at our high school. We have successfully collected both urine and saliva specimens as part of both our ***random*** and ***under suspicion*** drug testing efforts. Our school nurses are well trained and in eleven years, there has been not a single incident involving errors with the specimen collection process.

I urge the New Jersey Department of Education to resist the urge to regulate a process that is not in need of regulation. The proposed rules require schools to use clinical laboratories for screening tests such as urine drug tests. Schools in New Jersey have been successfully conducting on-site tests for years. Any nurse or health care worker is more than able to facilitate this process and labs used by our schools train health office personnel in strict chain of custody procedures.

The federal Substance Abuse and Mental Health Services Administration (SAMHSA) has evaluated on-site tests called POCT (point of care tests) and notes the following:

> *Non-instrumented POCT for urine testing have been subjected to evaluations by investigators independent of the manufacturers and found to perform similar to that of the instrumented immunoassay tests in certified laboratories. These tests were conducted on both spiked and donor specimens with and without drug analytes.* ***Little difference in the performance of these devices was observed between tests conducted by laboratory technicians and laymen who had been trained in the proper procedures for conducting and reading tests.*** Proposed Revisions to Mandatory Guidelines for Federal Workplace Drug Testing Programs, 69 Federal Register 19673, 19677 (April 13, 2004).

It is indeed disturbing that the DOE action will have the unintended consequence of disrupting and dismantling the growing number of school based student random drug

testing programs which have been extremely successfully in deterring and lowering drug use among New Jersey teens. The clinical laboratory standards that the DOE is proposing to use are for medical diagnostic tests. The current random drug testing program at Hunterdon Central Regional High School has been upheld by the New Jersey Supreme Court and was lauded for its procedures and practices. Student drug testing is not a medical diagnostic test and is not used to refer students to treatment as alleged by this proposal. Students are referred to treatment as a result of an intensive evaluation completed by school based student assistance counselors. The purpose of student random drug testing is to provide a deterrent to drug and alcohol use by our teens. Its purpose is to provide a safe school environment and experience for every student. Its purpose is to keep kids from beginning to use drugs so as to avoid expensive school costs associated with drug use. Its purpose is to keep kids off drugs so that they can learn and participate in athletics and extracurricular activities with friends who are also drug free.

The most immediate result of the implementation of the proposed rules will be the significant increase in the cost of school drug testing at every level. In addition, this proposal puts a huge and unnecessary stumbling block in the way of schools that are making the choice to confront drug and alcohol use by teens in an effective and structured way. Student random drug testing programs enjoy wide community and parent support. School districts utilizing student random drug testing programs have spent immeasurable time bringing these initiatives forward and deserve to have the support of the DOE. Saddling schools with unnecessary regulations grounded in unfounded and speculative concerns is an irresponsible action that will waste taxpayer dollars and hinder schools in their efforts to keep teens away from drugs and implement effective, cost-effects programs supported by parents and communities.