

Reasonable Suspicion Testing of Impaired Staff Member with Clinical Duties Policy – SAMPLE

Subject: Reasonable Suspicion Testing of Impaired Staff Member with Clinical Duties Policy

Number: _____

Effective date: _____

Supersedes SPP: _____

Approved by: _____

(Signature) _____ Date _____

Distribution: _____

OBJECTIVE

To define (*insert name of the organization*) policy and procedures for identifying and addressing potential drug diversion by a staff member or impairment of a staff member.

POLICY

Any staff member with clinical responsibilities who appears to be unfit for duty due to suspected influence of alcohol or other drugs shall be required to undergo a drug test by urinalysis, breathalyzer or blood sample. Reasonable suspicion is based on specific facts and reasonable inferences drawn from those facts in light of experience.

Any suspected staff member who refuses to submit to such testing will be immediately suspended and subject to corrective action up to and including termination. Human resources must be contacted prior to or immediately subsequent to a suspension.

Because an impaired staff member may endanger the safety of patients, other staff members or himself/herself, a supervisor will immediately remove any staff member suspected of being impaired from the work situation.

When impairment is suspected, the supervisor will work with the staff member to ensure that he/she does not operate a motor vehicle when leaving the premises, regardless of whether he/she agrees to be tested or not.

Criteria that commonly lead to reasonable suspicion testing of staff members include:

- Observable behavior;
- Pattern of deteriorating performance;
- Information from a reliable source;
- Missing controlled substances;
- Post-accident and incident testing.

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REASONABLE SUSPICION

Upon receipt of reliable information that a staff member is impaired or is diverting drugs from (*insert name of the organization*), the individual will immediately be removed from his/her work duties pending further investigation and drug screening. If drug diversion is suspected and the staff member has access to medication cabinets, such access will be immediately suspended pending the conclusion of the investigation. This may be arranged by contacting (*insert contact name*).

When reasonable suspicion exists, the staff member's supervisor or manager and human resources will be notified. If drug diversion is suspected and the diversion specialist is not already involved, the diversion specialist will also be notified.

ARRANGING FOR A STAFF MEMBER INTERVIEW AND DRUG TESTING

Prior to meeting with the staff member, arrangements shall be made to conduct the interview in a location where both privacy can be ensured and drug testing can be conducted nearby.

_____ performs all of (*insert name of the organization*), reasonable suspicion drug tests and is available 24 hours a day. When _____ is contacted to do a drug screen, the following information will be provided:

- Name and contact number of the supervisor
- Location and time the test is to occur
- Gender of the team member to be tested
- Any special circumstances, including whether breathalyzer alcohol testing is desired

The number of people present for the staff member interview should be kept to a minimum. Generally those present for the interview may include the staff member's supervisor or manager and the diversion specialist (if drug diversion is suspected). A human resources representative, nursing supervisor or security official may also be present.

In order to avoid tampering with the urine specimen, the staff member should not be "tipped off" that he/she is going to be asked to undergo a drug screen. It is acceptable and accurate in cases of suspected drug diversion to notify the staff member that he/she is being asked to meet with administrative personnel to review concerns about documentation.

STAFF MEMBER INTERVIEW AND DRUG SCREEN

Prior to the interview, the staff member will be introduced to all individuals present in the room. The staff member will be apprised of the reason for the meeting and advised that a drug screen will be requested.

The observed behavior or evidence of drug diversion and/or impairment will be reviewed

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with the staff member and he/she will be given an opportunity to respond and explain.

In conjunction with the interview and prior to the drug screen, the following documentation will be completed:

- These forms are available_____.
- The standard urine drug screen (*insert name of the organization*), uses includes:

If there is a need to test for any other substances, these must be prominently identified on the *Chain of Custody* order form. Fentanyl and many sleep aids must be specifically listed to be included in the panel. If there is uncertainty about whether a particular substance will be included in the drug test, the substance must be listed separately on the *Chain of Custody* order form.

If the staff member has difficulty producing a specimen, he/she may be given an average size glass of water. To avoid dilution of the specimen, additional liquids should only be given pursuant to the recommendations of the medical review officer.

Prior to the drug screen, the staff member should be asked to remove any unnecessary outer clothing (e.g., jackets, vests) and remove any items from his/her pockets. The staff member should not take any personal belongings into the bathroom.

All reasonable suspicion drug screens are required to be observed. If not readily available, arrangements should be made to secure an observer of the same gender as the staff member being tested.

If the staff member confesses to drug diversion or impairment, he/she should be encouraged to self-report to the employee assistance program or a relevant professional assistance program. If the staff member admits to drug diversion, he/she should be asked to make a written statement, including what was diverted, how, why, and for how long. The staff member should also be questioned about the existence and location of any diverted medication. If the staff member indicates that diverted medication is on the premises or at a location off campus, (*insert name of the organization*), security personnel should be contacted so that the medication may be retrieved and inventoried. Any diverted medication that is retrieved will ultimately be delivered to pharmacy for proper destruction.

The medical review officer is responsible for verifying any legitimate prescriptions the staff member states he/she has. No other individual should undertake this investigation.

STAFF MEMBER DISPOSITION

If, in the course of the interview and drug screen, the staff member is cleared of any suspicion of drug diversion or impairment, he/she may return to work. In all other cases, the staff member shall be suspended from work duties pending the conclusion of the investigation. Staff members who are suspended should be advised not to return to the

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HOSPITAL campus until notified by his/her supervisor.

IMPORTANT NUMBERS:

Human Resources –
Diversion Specialist –
Drug Testing Service –
Professional Assistance –
Employee Health –
Employee Assistance Program (EAP) –
Nursing Administration –
ER –
Pharmacy –
Security –

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