



PURPOSE

The purpose of this implementation guideline is to provide management and employees with the tools and resources necessary to address an incident of suspected employee impairment in the workplace.

REFERENCES

- Federal Drug-Free Workplace Act of 1988
- California Drug-Free Workplace Act of 1990
- University of California Policy on Substance Abuse (November 1, 1990)
- Implementing Guidelines for the University of California Policy on Substance Abuse (December 4, 1990)

SUPERVISOR RESPONSIBILITIES

1. If there is reason to suspect that an employee is under the influence of drugs or alcohol on the job, or after receiving a report of suspected impairment, the Supervisor should observe the employee's manner for behavioral and/or physical signs of impairment, including but not limited to:
  - a) Bloodshot eyes;
  - b) Pupils constricted or dilated;
  - c) Inappropriate shivering or tremors;
  - d) White powder around nose;
  - e) Smell of alcohol or burning leaves;
  - f) Drowsiness/sleepiness;
  - g) Slurred or rambling speech;
  - h) Lack of coordination in walking, such as staggering or weaving;
  - i) Unexplained change in physical appearance or hygiene;
  - j) Wide swings in mood or attitude; and/or
  - k) Change in performance and/or increased mistakes.
2. Document observations as related to employee's inability to perform their work duties satisfactorily.
3. Corroborate observations with another supervisor, the Hospital Supervisor, Security Supervisor or Human Resources, or contact FSAP for a confidential consultation. Notify HR Employee Relations and Security Office of the situation.

4. Personally escort the employee to a private area. Have another supervisor, the Hospital Supervisor, Security Supervisor or Human Resources in attendance for the discussion with the employee.
5. Inform the employee of the reasons for suspecting impairment and that a substance abuse screening may be requested. From the ensuing discussion, determine whether there is sufficient evidence to suggest that the employee is impaired.
  - a) If there is insufficient observable evidence and the employee appears able to perform their work duties, have the employee return to work. Follow up by consulting with HR Employee Relations to address any observed performance problems.
  - b) If there is sufficient cause to believe that the employee is impaired, inform them that there is a concern that the Drug-Free Workplace policy may have been violated and they are being directed to obtain to a substance abuse screening. Inform the employee that their refusal to consent to a substance abuse screening, or a positive finding, may result in disciplinary action up to and including dismissal from employment.
6. Obtain the *Directive to Obtain a Substance Abuse Screening and Immediate Placement on Paid Investigatory Leave* template memo, a copy of Appendix A of this Guideline, a First Lab forensic drug testing custody and control form and taxi vouchers from one of the locations or contacts listed in Appendix B. Complete the information as required on the template memo. Make three (3) copies of the packet for distribution as follows: 1) HR Employee Relations; 2) department/unit records; and 3) Hospital Supervisor (if applicable).
7. Inform the employee that they are directed to obtain a substance abuse screening within the next two hours and that they are being placed on paid investigatory leave until the results of the substance abuse screening are available. Give the employee the completed *Directive to Obtain a Substance Abuse Screening and Immediate Placement on Paid Investigatory Leave* memo with a copy of Appendix A of this Guideline, a First Lab forensic drug testing custody and control form and taxi voucher. Assist the employee in making arrangements for transport to the desired medical office collection site (see Appendix A). If necessary, provide a second taxi voucher or assist the employee in arranging transportation home, after the screening is completed.
8. Determine appropriate next steps based on documented observations and results of the substance abuse screening.
  - a) If the substance abuse screening is negative, work with HR Employee Relations to determine whether an Investigatory Meeting should be conducted prior to the employee's return to work.
  - b) If the substance abuse screening result is positive, or if the employee fails to obtain a substance abuse screening within the required two-hour timeframe, work with HR Employee Relations to schedule an Investigatory Meeting.
9. Contact the employee to inform them of the date, time and location of the Investigatory Meeting, providing sufficient time for the employee to arrange for union representation. Conduct the meeting.

10. In consultation with HR Employee Relations, determine the disciplinary action to be taken, up to and including termination. Consider whether to provide the employee with a Return to Work Agreement with the requirement to seek substance abuse counseling and/or rehabilitation as a condition of continued employment. If a Return to Work Agreement is the selected course of action, establish appropriate conditions for success and consequences of failure. Conditions of success should be based on the individual circumstances of the case and may include:

- a) Changes in work assignments, restrictions and expectations;
- b) Attendance verification requirements for participation in a diversion or rehabilitation program;
- c) Subsequent substance abuse screenings; and/or
- d) Required participation in an after-care program.

11. Prepare letter of disciplinary action, notice of intent and/or Return to Work Agreement for issue to the employee.

#### HOSPITAL SUPERVISOR RESPONSIBILITIES [after normal business hours]

1. Complete Supervisor Responsibilities Steps 1 through 6 as outlined above, coordinating with a Security Supervisor for the second supervisor's observation and assessment in Steps 3-6.
2. Provide the employee with the *Directive to Obtain a Substance Abuse Screening and Immediate Placement on Paid Investigatory Leave* template memo with a copy of Appendix A of this Guideline, a First Lab forensic drug testing custody and control form and taxi voucher for the employee's transportation home. Template memo should inform employee to obtain a substance abuse screening by 0800 on the next business day. Template memo and attachments are available from locations or contacts listed in Appendix B.
3. If diversion is suspected, contact the Chief Pharmacy Officer to request an audit of the employee's PYXIS access and supply inventories; and
4. Contact the employee's supervisor and HR Employee Relations to report that the employee has been sent for a substance abuse screening and placed on investigatory leave.

#### LABORATORY/VENDOR RESPONSIBILITIES

1. The collection site medical staff will:
  - a) Obtain the employee's consent to conduct the substance abuse screening, and consent to release screening results to the UCSF Medical Center Director of Employee Relations, or designee;
  - b) Collect a urine and/or blood specimen for the substance abuse screening; and
  - c) Ensure the security of the specimen and provide for chain of custody; and
  - d) Temporarily store the specimen until transported to the testing laboratory.
2. The testing laboratory will analyze the urine and/or blood samples and will report the results to the First Lab Medical Review Officer.

3. The testing laboratory will provide technical assistance (if needed) to the First Lab Medical Review Officer for interpretation of any positive confirmed screening results.
4. The First Lab Medical Review Officer will inform the Director of Employee Relations (or designee) of the results of the substance abuse screening.

#### HR EMPLOYEE RELATIONS RESPONSIBILITIES

1. Provide guidance and assistance to the Supervisor:
  - a) From moment of first report or suspicion of employee impairment;
  - b) Through referral for substance abuse screening and placement on investigatory leave;
  - c) With advance preparations and by participation in the Investigatory Meeting;
  - d) During consideration of appropriate next steps based on the outcome of the substance abuse screening and Investigatory Meeting; and
  - e) For preparation of any written documents, including letter of disciplinary action, notice of intent or conditional work agreement for issue to the employee.
2. If incident occurs during normal business hours:
  - a) Contact the medical office collection site (see Appendix A) to report that the employee is being sent for a substance abuse screening; and
  - b) If diversion is suspected, contact the Chief Pharmacy Officer to request an audit of the employee's PYXIS access and supply inventories.
3. Consult with the Office of Legal Affairs to investigate and pursue additional regulatory or licensing board reporting requirements for the employee's suspected impairment.
4. Notify the appropriate union representative of the employee's status on investigatory leave.
5. Inform FSAP of the incident so that they will be prepared to work with the employee if contacted.
6. Confirm that the employee obtained the substance abuse screening and relay results to the supervisor when received.
7. Keep all necessary parties appropriately informed throughout the investigatory process.



University of California  
San Francisco

## APPENDIX A – MEDICAL OFFICE COLLECTION SITE LOCATIONS

<b>Collection Site/Address</b>	<b>Tele/Fax</b>	<b>Hours of Operation</b>
<b>SAN FRANCISCO</b>		
Concentra Medical Center 2 Connecticut Street San Francisco, CA 94107	415.621.5055 415.621.0611 fax	M-F 7AM-6PM SA 9AM-3PM
Concentra Medical Center 26 California Street San Francisco, CA 94111	415.781.7077 415.781.7099 fax	M-F 7AM-6PM SA 9AM-3PM
<b>BERKELEY</b>		
Quest Patient Service Center 2999 Regent Street, Suite 101 Berkeley, CA 94705	510.849.3181 510.849.3187 fax	M-F 7AM-5:30PM
<b>FRESNO</b>		
Concentra Medical Center 7265 North First Street, Suite 105 Fresno, CA 93720	559.431.8181 559.431.1291 fax	M-F 7:00AM-5:00 PM
Madera Community Hospital 1250 E. Almond Avenue Madera, CA 93637	559.675.5542 559.675.5442 fax	SU-SA 12:00AM-11:59PM (24 hours, 7 days/week)
<b>OAKLAND</b>		
Concentra Medical Center 384 Embarcadero West, 1 <sup>st</sup> Floor Oakland, CA 94607	510.465.9565 510.465.3840 fax	M-F 8AM-5PM
<b>RICHMOND</b>		
Concentra Medical Center 2970 Hilltop Mall Road, Suite 203 Richmond, CA 94806	510.222.8000 510.222.2690 fax	M-F 8AM-5PM



**APPENDIX B – SUBSTANCE ABUSE SCREENING PACKET LOCATIONS**

<b>Work Site Location</b>	<b>Contact Name/Number</b>
<b>PARNASSUS</b>	
Central Resource Group Office 505 Parnassus Avenue, M-181	Patient Care Manager: 415.353.4243 OR Hospital Supervisor, by page after hours
<b>CHINA BASIN</b>	
Clinical Laboratories 185 Berry Street, Suite 290	Administrative Director: 415.353.9319
<b>EXECUTIVE PARK</b>	
250 Executive Park Boulevard	Contact Labor and Employee Relations: 415.353.4012 or 415.353.4107
<b>EMERYVILLE</b>	
Patient Financial Services (PFS) 6425 Christie Avenue, 3 <sup>rd</sup> Floor	Administrative Analyst: 415.353.3760
Medical Group Business Services (MGBS) 2000 Powell St, Ste. 1100	Supervisor: 415.353.4399
<b>FRESNO</b>	
UCSF-Fresno Medical Center 155 N. Fresno Street	Manager: 559.499.6411
<b>LAKESIDE</b>	
Family Medical Center 1569 Sloat Boulevard	Administrative Director: 415.353.3213
<b>MISSION BAY</b>	
Orthopaedic Institute 1500 Owens Street	Director: 415.353.8319
Benioff Children’s Hospital 1975 Fourth Street, C-1932A	Nursing Supervisor on duty: 415.502.0728
<b>MISSION CENTER BUILDING</b>	
1855 Folsom Street	Contact Labor and Employee Relations: 415.353.4012 or 415.353.4107
<b>MOUNT ZION</b>	
1600 Divisadero Street A-333 (PreOp, PostOp, & Surgical Short Stay Office)	Contact 415-885-3653 or Security Services for entry