The University of Michigan School of Nursing

Undergraduate and Graduate Student Drug Testing Policy and Procedure

The use of "alcohol and other substances potentially places patients, the public, and nurses themselves at risk for serious injury or death" (International Nurses Society on Addictions, 2017). The University of Michigan School of Nursing (UMSN) is committed to the safety of patients, students, faculty, and staff. Michigan Medicine is also dedicated to the promotion of health of its community members including those with physical, psychiatric, and substance use concerns and establishes consistent policies and procedures that foster safety and health. The UMSN supports wellness, restoration, and rehabilitation of students to promote optimal personal and professional functioning. The UMSN supports students in caring for themselves in order to safely care for others.

In an effort to promote patient safety and to facilitate early identification and interventions for students with substance use and related disorders, as well as compliance with mandates of affiliated clinical agencies, it is the policy of the UMSN to test for substance use among all of its students annually.

All Students

All students enrolled at the UMSN must complete an annual drug screening test.

- Students must provide a viable urine specimen to be tested for substances, consistent with industry standards in the health care field on dates specified by the UMSN.
- Some clinical site guidelines may be more stringent than industry standards and require 12 panel drug screening tests.
- Refusal to provide a specimen for drug testing will be considered a positive drug test and subject to the established procedures for positive tests (see below for policy regarding positive screens).
- Diluted test results (as determined by the Medical Review Officer), including diluted negatives, will require a follow-up drug screen at the student's expense. This screen may be obtained by an alternative collection method such as blood or hair.
- In special circumstances, the UMSN may request, at any time, the collection of an alternative specimen such as blood or hair.
- Testing must occur at a facility specified by the UMSN.
- Testing will be at the expense of the student.
- The following may be screened for including but not limited to: amphetamines, barbiturates, benzodiazepines, cocaine, fentanyl, hydrocodone, marijuana, methadone, methaqualone, opiates, oxycodone, phencyclidine (PCP), propoxyphene, and tramadol
- Drug tests are reviewed by the Medical Review Officer (MRO) and retained by the compliance vendor. MROs may access the Michigan Automated Prescription (MAPS) or alternatives as indicated, to corroborate the existence of a legitimate prescription for students. For claims related to purported prescription medications, e.g. benzodiazepines, opioids, the students will sign any and all releases of information (ROI) as requested by

the MRO to allow for communication with the identified prescriber and to facilitate factfinding by the MRO. The MRO will make a determination regarding the legitimacy of any prescriptions or evidence of illicit substance use. Students who do not provide ROI will be treated as if their screen is positive (see below for policy regarding positive screens).

- If the MRO attempts to contact a student about the results of their drug screen and the student fails to respond within 3 business days, the school will again contact the student by email and / or by telephone. If the student still does not respond to the MRO within 2 business days, this will be treated as a positive drug screen (see below for policy regarding positive screens).
- Clinical agencies must also approve placements for students with positive drug screens or the placement will be cancelled. If the MRO cleared the positive test, then that documentation along with the health provider's note documenting the prescription use must also be sent to the Clinical agency for review and clearance for placement. If the placement is not approved, another placement option will be considered for that individual. Agencies that are members of the ACEMAPP placement system require that they be informed of positive drug screens.
- To ensure confidentiality, one undergraduate and one graduate liaison within the UMSN will be identified as the contact people to receive positive drug screen reports and will convey that information to the appropriate program Associate Dean or designee.
- Any clinical or research related activity will immediately be suspended pending the outcomes of an inquiry.
- The drug screen results and details of these or related findings remain the sole responsibility and privilege of the UMSN for the sake of confidentiality. The results are maintained within the compliance documentation system maintained by the vendor and are not placed in the student academic files. Positive results are not specifically reported but all external and internal communication would indicate that the student is "not in compliance" with requirements for clinical placement or research activity. However, as stated earlier, the positive results would be shared with the clinical or research agency per agency guidelines if the MRO clears the student for placements.
- The student will be interviewed by the Associate Dean and any other UMSN officials relevant to the situation and referred for a substance use evaluation to a facility and/or health provider professional specializing in substance use disorder treatment, as specified by the UMSN.
- The student will be responsible for any expenses related to the substance use evaluation and treatment.

Undergraduate Students (students with RN Licensure see below)

• The student must be evaluated for substance use by the health professional and must sign a ROI allowing the evaluator to report findings and recommendations for treatment related to the substance use to the Associate Dean of the student's respective program at UMSN.

- If the student refuses to obtain a substance use evaluation or sign a ROI allowing the UMSN access to recommendations from the evaluation, this will result in the inability to continue in the clinical or research areas in any affiliated agency until these are completed.
- The Associate Dean or designee will review the recommendations and make a determination regarding the student's ability to continue their clinical or research activities at that point in time. Consideration will be given to the nature of the substance use, impairment, treatment recommendations, and affiliated agency requirements.
- Students for whom no treatment recommendations are made will be referred to an education program related to substance use such as those on alcohol or marijuana use.
- In the event that the results of the substance use evaluation indicate need for treatment, the UMSN will require that the student sign a ROI from the health professional conducting the treatment. The UMSN will request recommendations from the health provider as well as a negative drug screen in order for the student to return to any clinical or research activity in an agency.
- A return to any clinical placement or research activity in an affiliated agency will require a negative drug screen and satisfactory recommendations by the health care provider. The student must also meet with Technical Standards as stated in the UMSN Undergraduate and Graduate Student Handbooks of Academic Policies and Procedures.
- Students who have had a positive drug screen that was not cleared by the MRO, as well as those with a positive drug screen and subsequent intervention, must submit to random drug screening for one year at times designated by the UMSN. Another positive drug screen will initiate the steps of the drug policy procedure again. Subsequent positive tests and subsequent delays in completing program requirements may result in an inability to complete the program and can be considered a violation of the Student Code of Conduct.

Students with RN Licensure

- A student who is a licensed Registered Nurse and who has a positive drug screen test that is not cleared by the MRO will be offered an opportunity to self-report to the Michigan Health Professional Recovery Program (HPRP)* for subsequent evaluation and treatment recommendations and may be allowed to resume his or her nursing education under the following circumstances:
 - Provision of any and all appropriate ROIs between the HPRP, the MRO, and UMSN
 - Adherence to all restrictions, e.g. access to opioid medications for a specified period of time, as determined by the HPRP and conveyed to a designated UMSN liaison
 - Full participation in random drug screens, the results of which will be reported to the MRO and UMSN liaison
- If an RN licensed student refuses a drug screen or provides a positive test that is not cleared by the MRO and declines to self-report to the HPRP and follow treatment

recommendations fully, then UMSN may suspend indefinitely the enrollment and participation of the student in any or all courses, clinical placements, or research settings, pending positive resolution at the discretion of the UMSN.

• If an RN licensed student refuses a drug screen or provides a positive test that is not cleared by the MRO and declines to self-report to the HPRP, the UMSN will report the licensee to the Department of Licensing and Regulatory Affairs (LARA).

Under Sections 333.16222 and <u>333.16223 of the Public Health Code</u>, licensed/registered health professionals are required to make good faith reports of suspected violations of the Public Health Code to the Department of Licensing and Regulatory Affairs, Bureau of Professional Licensing, including violations of Michigan controlled substances laws and incidents of impairment.

- In the event that an RN licensed student has enrolled and successfully participated in a structured monitoring programs and suffers a lapse or relapse, then communication will ensue between the UMSN and HPRP and a determination will be made on a case-by-case basis regarding an appropriate response.
- If an RN licensed student participates in the HPRP, the UMSN will follow the treatment recommendations from the health provider that may include activities such as monitoring the student while in the practice setting and observing for impairment**.
- The RN licensed students' ability to practice or conduct research activities safely must be established by a specialist in addictions.

*The Health Professional Recovery Program (HPRP) is a State of Michigan program administered through a contract with the Michigan Department of Licensing and Regulatory Affairs, Bureau of Health Care Services, which supports the recovery of its participants so that they may safely return to practice and protect the safety of the general public. Click <u>here</u> for more information. Click <u>here</u> for FAQ.

** Impairment: the reduced ability of an individual to perform duties while acting in the scope of educational or research responsibilities for the UMSN, while on-call or while treating or offering treatment advice for patients or research participants. Examples of behaviors that suggest possible impairment include but are not limited to: loss of balance, stumbling, staggering, leaning on objects for support, red or glassy eyes, pupillary changes, unkempt appearance, and odor of alcohol, observed to be in possession of or using substances.