| Northeast Ohio MEDICAL UNIVERSITY | NORTHEAST OHIO MEDICAL UNIVERSITY | Policy No: 3349-AC-266 |
|---|-----------------------------------|---|
| POLICY TITLE: Toxicology Screening Policy | | EFFECTIVE DATE: January 1, 2023 REVISED: June 20, 2023 |
| RESPONSIBLE DEPARTMENT: Student Services | | APPROVING AUTHORITY: Provost |

F(A) PURPOSE

Northeast Ohio Medical University (NEOMED) is committed to providing the highest level of educational activity, while holding its students to the highest level of professional conduct. This commitment includes an obligation to ensure that students are functioning free from the influence of illegal substances. This policy is designed to ensure a clear understanding of the expectation that students participate in Toxicology Screening to ensure their safety, the safety of their patients, and the safety of the health care environments where they may be participating in direct patient care activities, as well as comply with the requirements of the facility at which that care is being provided.

(B) SCOPE

(1) This policy applies to all students enrolled in academic programs that include Clinical Activity (as defined in this policy).

(C) DEFINITIONS

- (1) "10-Panel" refers to the standard 10-panel drug test using a person's urine to check for drug residues. A 10-panel drug test will look for ten of the most common drugs that a person may be abusing. This selection usually includes five common prescription medications and five illegal drugs.
- (2) "Addiction Specialist" refers to either an addiction psychiatrist or addiction medicine physician who also holds a specialized certification. Addiction and substance use disorder are complex medical conditions that require the assistance of clinical staff such as an Addiction Specialist.
- (3) "Clinical Activity" refers to any activity involving direct patient care; it does not include shadowing experiences.
- (4) **"Clinical Site"** refers to any health care facility where students participate in Clinical Activity as part of the curricular requirements of their academic program.

| Northeast Ohio MEDICAL UNIVERSITY | NORTHEAST OHIO MEDICAL UNIVERSITY | Policy No: 3349-AC-266 |
|---|-----------------------------------|---|
| POLICY TITLE: Toxicology Screening Policy | | EFFECTIVE DATE: January 1, 2023 REVISED: June 20, 2023 |
| RESPONSIBLE DEPARTMENT: Student Services | | APPROVING AUTHORITY: Provost |

- (5) "Prescription" refers to written instructions from a physician, dentist, etc., to a pharmacist stating the form, dosage strength, etc., of a drug to be issued to a specific patient. While it is legal in Ohio to use marijuana for medicinal purposes, it is not available via Prescription and remains an illegal Schedule 1 substance under federal law.
- (6) "Toxicology Screening" refers to various tests that determine the approximate amount and type of legal or illegal drugs that a person has taken. NEOMED utilizes a urine sample or saliva swab. A Toxicology Screening can also be referred to as a drug test.

(D) BODY OF THE POLICY

(1) Pursuant to the Administration of Student Conduct policy, students are required to report any criminal charges, including those related to illegal drug possession or use, as they may have implications for current or future licensure. Students are also encouraged to voluntarily self-disclose any addiction concerns or treatment needs in advance of any Toxicology Screening. Concerns in this area can best be addressed and ameliorated when a student with potential addiction concerns voluntarily comes forward for treatment, support and care which can be provided through or coordinated by NEOMED staff or referral to an external Addiction Specialist.

(2) Toxicology Screening Process

- (a) All Toxicology Screenings are coordinated by the Office of Student Services on behalf of all colleges at NEOMED.
- (b) The Toxicology Screening procedures are available in Appendix A of this policy.
- (c) NEOMED contracts with a third-party vendor to provide the screening services, results, and communication of these results back to NEOMED.

| Northeast Ohio MEDICAL UNIVERSITY NORTHEAST OHIO MEDICAL UNIVERSITY | Policy No: 3349-AC-266 |
|--|---|
| POLICY TITLE: Toxicology Screening Policy | EFFECTIVE DATE: January 1, 2023 REVISED: June 20, 2023 |
| RESPONSIBLE DEPARTMENT: Student Services | APPROVING AUTHORITY: Provost |

- (d) The substances listed below may be included in the urine Toxicology Screening.
 - i. Amphetamines/Methamphetamines
 - ii. Cocaine and Metabolites
 - iii. Cannabinoids (Marijuana)
 - iv. Opiates (Morphine and Codeine)
 - v. PCP
 - vi. Barbiturates
 - vii. Methadone
 - viii. Propoxyphene
 - ix. Ecstasy
 - x. Benzodiazepines
- (3) Screening Timeline
 - (a) Students are screened within a sufficient timeframe for screening results to be received by NEOMED and for notification of Toxicology Screening compliance to be relayed to the clinical site where a student is assigned prior to the start of Clinical Activities.
 - (b) Testing occurs in the following timeframes and cohorts as identified by each college.
 - i. College of Medicine: M1 Fall and M2 Spring
 - ii. College of Pharmacy: P3 Spring
 - iii. College of Graduate Studies: Anesthesiology Assistant program: Spring, year one
 - iv. College of Dentistry: D1 Fall and D2 Spring
 - (c) Additional screenings outside of identified testing in section 3(b) that are required by clinical sites are the scheduling and payment responsibility of the student.

| Northeast Ohio MEDICAL UNIVERSITY NORTHEAST OHIO MEDICAL UNIVERSITY | Policy No: 3349-AC-266 |
|--|---|
| POLICY TITLE: Toxicology Screening Policy | EFFECTIVE DATE: January 1, 2023 REVISED: June 20, 2023 |
| RESPONSIBLE DEPARTMENT: Student Services | APPROVING AUTHORITY: Provost |

(d) Additional screenings outside of the identified testing schedule (noted in this policy) may be conducted on the basis of reasonable suspicion pursuant to the Mood-Altering or Consciousness Altering Substances policy.

(4) Toxicology Screening Results

- (a) Results of Toxicology Screening will be maintained confidentially and managed through the Office of Student Services and the Assistant Director of Credentialing in a manner that complies with applicable state and federal requirements.
- (b) If an initial positive result is obtained for any of the substances within the 10-Panel screening, the screening service will have a Medical Review Officer contact any student with a positive screen directly to request proof of prescriptions before a final positive result is reported to NEOMED. Failure to respond to the Medical Review Officer may result in a positive screen result notification to NEOMED.
 - Proof of prescription cannot be provided prior to a Toxicology Screening.
 - ii. An Ohio Medical Marijuana Registry card is not considered a Prescription. While legalized for medicinal purposes in Ohio, marijuana is still considered an illegal Schedule I substance under federal law. A positive result for marijuana will be communicated to NEOMED regardless of the possession of an Ohio Medical Marijuana Registry card.
- (c) Negative screening results will be noted as such in the Student Immunization Certificate, which can be printed through NEOMED's secure credentialing record management platform. Students can share this information with Clinical Sites as requested.

| Northeast Ohio MEDICAL UNIVERSITY | NORTHEAST OHIO MEDICAL UNIVERSITY | Policy No: 3349-AC-266 |
|---|-----------------------------------|---|
| POLICY TITLE: Toxicology Screening Policy | | EFFECTIVE DATE: January 1, 2023 REVISED: June 20, 2023 |
| RESPONSIBLE DEPARTMENT: Student Services | | APPROVING AUTHORITY: Provost |

- (d) All screening results will be stored in a confidential manner and separate from the student's academic file unless the matter is referred to and heard by the Student Conduct Officer, Student Conduct Hearing Board, or the Committee on Academic and Professional Progress.
- (e) Students who refuse to complete Toxicology Screening or receive a positive result will not be permitted to participate in any Clinical Activity, and will be referred to the Student Conduct Officer for appropriate action including, but not limited to, the following:
 - i. Repeat the Toxicology Screening until a negative result;
 - ii. Assessment by an Addiction Specialist;
 - Substance abuse treatment requirements;
 - iv. The imposition of a medical leave of absence if necessary; or
 - v. Subsequent monitoring and treatment requirements must be met before a student may be permitted to return to and/or remain in the curriculum; and
 - vi. Notification to the Ohio State Board of Pharmacy for all pharmacy students. The student will be guided and encouraged to self-report to the Board, however, if the student does not do so, the College of Pharmacy will report as required.
- (f) Failure to comply with these policy requirements of NEOMED may result in disciplinary action.

| Northeast Ohio MEDICAL UNIVERSITY NORTHEAST OHIO MEDICAL UNIVERSITY | Policy No: 3349-AC-266 |
|--|---|
| POLICY TITLE: Toxicology Screening Policy | EFFECTIVE DATE: January 1, 2023 REVISED: June 20, 2023 |
| RESPONSIBLE DEPARTMENT: Student Services | APPROVING AUTHORITY: Provost |

REFERENCES

FORMS

CROSS-REFERENCE

Administration of Student Conduct | Policy Portal | NEOMED, Policy 3349-05-10

DRUG-FREE SCHOOL & COMMUNITY ACT OF 1989 Policy 3349-07-35

LOA Checklist: https://www.neomed.edu/wp-content/uploads/LOA-checklist 3.10.20.pdf

REVISION HISTORY

February 2023

RULE PROMULGATED UNDER

LEGAL

| Northeast Ohio MEDICAL UNIVERSITY NORTHEAST OHIO MEDICAL UNIVERSITY | Policy No: 3349-AC-266 |
|--|---|
| POLICY TITLE: Toxicology Screening Policy | EFFECTIVE DATE: January 1, 2023 REVISED: June 20, 2023 |
| RESPONSIBLE DEPARTMENT: Student Services | APPROVING AUTHORITY: Provost |

APPENDIX A

1. Toxicology Screening Procedures

- a. Student information including name, birthdate, email address, and last four digits of the social security number will be securely sent to the third-party screening services by NEOMED.
- b. The screening service will email each student individually with instructions to sign-in to their "Application Station" to create an account.
- c. A follow-up email to students from the screening service provides instructions for visiting a collection site. The screening service may enlist an outside entity to conduct the collections.
- d. Students must take to the testing site identification (driver's license, passport, or birth certificate), the letter from the screening service and the student-specific account number that has been assigned by the screening service.
- e. Students must complete the urine testing at an approved screening site by the deadline date identified by NEOMED.
- f. If a clinical site requires a drug screen, the student is required to complete the testing. Requests to change a site assignment to avoid the testing will not be considered and could impact the on-time progression of a student if drug testing is not completed in a timely manner.