



University of Cincinnati College of Medicine

POLICY TITLE: <i>Toxicology Testing “For Cause” of Medical Students</i>	APPROVAL DATE: <i>December 7, 2017 Revised July 7, 2022</i>
RESPONSIBLE DEPARTMENT: <i>Office of Student Affairs</i>	APPLIES TO: <i>All Students</i>

PREAMBLE

This policy references the Honor Council and the Performance and Advancement Committee (PAC). The Honor Council serves as the College of Medicine’s primary committee for review of misconduct by medical students (see full charge in the [Honor Council Policy](#)). The PAC is responsible for monitoring the progress of each medical student through the curriculum. The PAC regularly reviews each student’s performance and may make decisions on promotion, retention, dismissal, leave of absence and compliance with COM standards.

POLICY STATEMENT

1. “For cause” drug and alcohol toxicology testing for medical students:

- a. The Associate Dean for Student Affairs or designee may act to order testing “for cause” when concerns are raised regarding the performance, behavior, or actions of a medical student that indicate a reasonable suspicion for substance impairment (e.g. drugs and/or alcohol) while the student is engaged in any College of Medicine (“COM”) program activity, course, class or clinical rotation.

The smell of alcohol or drugs is sufficient cause for following the procedure outlined in this policy. The use of prescribed medication that impairs the ability to work safely is also sufficient cause for following the procedure outlined in this policy.

Physical signs, symptoms and abnormal behavior may include, but are not limited to those listed on the [Observation Checklist for Unusual Behavior](#) that is completed by the initial observer of the student. (Attached)

If there is concern about the student’s health or safety, the student will be escorted for evaluation to University Health Services at Holmes (UHS), or the nearest emergency department in addition to undergoing toxicology testing.

- b. “For cause” drug and/or alcohol testing may be ordered when concerns are raised and/or a recommendation for drug and/or alcohol testing is made to the Associate Dean of Student Affairs or his/her designee by any of the following individuals and/or committees: the Performance and Advancement Committee (PAC), any faculty member or attending physician, any UCCOM staff member, any hospital staff member, fellow medical student, hospital administrator, other healthcare professional, patient, and/or family member.
- c. Once testing is ordered, it should be initiated immediately and must be completed within two hours when at all possible. Failure or refusal to undergo and/or complete testing in a timely manner will result in both a presumption of a positive toxicology result and mandatory leave of absence and/or other disciplinary action up to and including a recommendation for dismissal. A student’s refusal to undergo and/or complete testing includes, but is not limited to, an unexcused failure to provide an appropriate sample for testing, or any effort or test result that indicates tampering with the testing process or

results.

- d. There will be no opportunity to appeal the order to be tested “for cause.”

2. Procedure for Drug and Alcohol testing of medical students

- a. The clerkship or elective director for the rotation the student is on should be contacted first to be informed about the suspicion of impairment in the student. The clerkship or elective director should contact the Associate Dean for Student Affairs or designee to communicate the findings. The Office of Student Affairs will forward a copy of the [Observation Checklist for Unusual Behavior](#) to the site where the student is located to be completed by the person observing the student.
 - i. **UC Health site:** For students rotating at UC Health sites, testing will be performed on site by UC Health during business hours and by an outside agency that comes on site to perform the testing after hours. The procedure followed for employees at that site will also be followed for medical students.
 - ii. **Non-UC Health site:** If the student is at a non-UC Health site, testing will be completed by an outside agency unless that site prefers otherwise.
 - iii. **Away rotation:** If a UCCOM student is on an away rotation as a visiting student at another institution, the procedure for drug testing by that institution is followed.
 - iv. **Visiting student from outside institution:** A visiting student from an outside institution will be drug tested as per the policy for UCCOM students.
 - v. Cost of “for cause” testing will be covered by UCCOM but any additional medical evaluation sought by the student will be their financial responsibility.

3. Test results

- a. Result of toxicology testing is forwarded to the Associate Dean for Student Affairs or designee. The Associate Dean for Student Affairs or designee will only share the toxicology testing results with university employees to whom disclosure is necessary in order to effectuate the requirements and/or procedures of this policy or other UCCOM policies (e.g., PAC members) or as otherwise required by any applicable state and federal law.
- b. A positive toxicology screen will exist if the toxicology results present a finding of:
 - i. Illicit/illegal drugs or alcohol;
 - ii. Any prescription substance for which the student does not have a valid prescription;
 - iii. Any prescription substance for which the results indicate that it was taken in a manner that is inconsistent with how it was prescribed.
- c. Results are stored in the student file.
- d. The College of Medicine shall maintain the toxicology results in a manner that ensures the confidentiality of the results in compliance with applicable state and federal law.

4. Consequences to the student

- a. A student with a negative toxicology screen may be referred to the PAC and Honor Council due to concerns raised by the findings on the [Observation Checklist for Unusual Behavior](#).
- b. Failure or refusal to undergo and/or complete testing, as discussed in 1.c. will result in a presumption of positive toxicology result and mandatory leave of absence and/or other disciplinary action up to and including a recommendation for dismissal.
- c. A student with a positive toxicology screen will be placed on a mandatory leave of absence (LOA), and all educational and clinical activities will be discontinued. A student with a positive toxicology

screen will be referred to the Honor Council. Referral for such a finding could result in discipline up to and including a recommendation for dismissal. Refusal or failure to comply with the recommendations of the Honor Council may result in a discipline, up to and including a recommendation of dismissal from the College.

- d. Among other things, the Honor Council may recommend or require that a student with a positive toxicology report participate in the Ohio Physicians Health Program (OPHP) in Columbus, OH. Students required to participate in OPHP must permit OPHP to disclose to the College if the student received a positive toxicology report. A student's failure to comply with OPHP and/or a subsequent positive toxicology report will be grounds for discipline, up to and including a recommendation of dismissal from the College. Participation in OPHP will be at the student's expense.
- e. Non-UCCOM students may be terminated from working at the site where they were observed to be impaired and then will be held to the rules of their home institution. Results of toxicology testing is forwarded to the Associate Dean for Student Affairs and Admissions or designee at UCCOM. The Associate Dean for Student Affairs at the student's home institution is contacted to communicate the toxicology results and observations leading to drug testing.

OBSERVATION CHECKLIST FOR UNUSUAL BEHAVIOR

This checklist should be used to record unusual behavior of a medical student participating in any aspect of the curriculum. Check all items applicable. One witness should make the observation and sign the form.

Observer: _____ Date: _____

Department/site: _____ Time: _____

<i>Walking</i>	Stumbling Holding on	Staggering Weaving	Unsteady Unable to walk	Falling
<i>Standing</i>	Swaying Staggering	Rigid Sagging at knees	Feet wide apart Unable to stand	
<i>Speech</i>	Shouting Slow	Silent Rambling	Whispering Slurred	Slobbering
<i>Attitude</i>	Cooperative Crying Sarcastic	Polite Silent Aggressive	Calm Talkative	Sleepy Excited
<i>Actions</i>	Threatening Calm Hyperactive	Fighting Drowsy Hostile	Refusing to listen Profanity Erratic	
<i>Eyes</i>	Bloodshot Glassy	Watery Closed	Dilated	Droopy
<i>Face</i>	Flushed	Pale	Sweaty	
<i>Appearance/ Clothing</i>	Messy Have odor	Dirty	Partially dressed	Neat
<i>Breath/Body</i>	Alcohol odor Marijuana/other drug odor	No alcohol odor	Faint alcohol odor	
<i>Movements</i>	Fumbling Normal	Jerky Nervous	Slow Hyperactive	
<i>Eating/ chewing</i>	Gum Other (identify if possible) _____	Candy	Mints	

Other behavior unusual for this student:

Observer signature: _____ Date: _____

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