



EL PASO COMMUNITY COLLEGE PROCEDURE

For information, contact Institutional
Effectiveness: (915) 831-6740

FB-9

Substance Abuse Testing for Health Occupations Students

APPROVED: October 16, 2009 **REVISED:**
Year of last review: 2021
AUTHORIZING BOARD POLICY: FB

Classification: Administrative

Vice President or Associate Vice President: Vice President of Instruction and Workforce Education

Designated Contact: Dean or Director of the Program

OBJECTIVE: To ensure that all students enrolled in specified health-related educational courses and programs undergo substance abuse testing. Students who do not pass the drug screening will be unable to complete course/program requirements.

GENERAL:

I. Awareness and Education

- A. Information about substance abuse testing requirements will be published in the College *Catalog*, the semester course schedule, program information guidelines, and other documents as appropriate.
- B. Information about substance abuse testing requirements will be included in the Health Careers Orientation sessions conducted by the counselors and in any program-specific orientations conducted by program coordinators/faculty*.

II. Consent.

- A. The student will be asked to submit a copy of the *Pre-testing for Substance Abuse Consent Form* (attached to this College procedure) to the appropriate El Paso County Community College District (EPCCCD) representative (see “TESTING PROCESS,” Section I. B. 2). The student must agree to the release of the test results to the EPCCCD in writing.
- B. Withholding Consent. Covered students may refuse to submit to substance abuse testing. However, refusal to submit to a drug test when requested (initial, reasonable suspicion or follow-up testing; see “GENERAL,” Section VII) will result in immediate disciplinary action (e.g. administrative withdrawal from courses/program).

III. Confidentiality

- A. Substance abuse test results and other information acquired during the testing process will be treated as private and confidential information. Except as permitted or required by law, this information will not be disclosed by the College or the testing laboratory to any other employer, third party, government agency, or private organization without the covered student’s written consent. Communication of “cleared” test results will be provided to the clinical affiliate as stated in the *Pre-testing for Substance Abuse Consent Form*.
- B. Students completing educational requirements at an external agency will be reported to the educational institution’s designated contact upon violation of the external agency’s procedures or upon identification of reasonable cause for testing.
- C. Documentation will be maintained in a separate secure file in the EPCC educational administrator’s office. Retention of this information will be in accordance with applicable record retention requirements.
- D. Access to detailed information will be restricted solely to those employees having a demonstrated absolute need to know, including, but not necessarily limited to: the designated educational administrator or his/her designee, an authorized agent of a licensing/certifying agency, or upon presentation by a valid subpoena and/or request by a duly authorized regulatory agency.

***Note: The word “faculty” denotes instructors, counselors and librarians.**

IV. Definitions

- **Controlled Substance.** a substance, including a drug, an adulterant, dilutant, and an immediate precursor listed in Chapter 481 of the Texas Health and Safety Code.
- **Controlled Substance Analog.** (1) a substance with a chemical structure substantially similar to the chemical structure of a controlled substance as defined in Chapter 481 of the Texas Health and Safety Code or (2) a substance specifically designed to produce an effect substantially similar, or greater than, the effect of a controlled substance.
- **Illegal drug.** Any substances controlled under federal and state law that are not authorized for sale, possession, or use, including legal drugs that are obtained or distributed illegally, inhalants having psychological and/or physiological effects, or prescription medication when used in a manner or for a purpose other than prescribed and/or used by someone other than the person prescribed for. Controlled substance analogs or volatile substances that produce the psychological and/or other physiological effects of a controlled dangerous substance are also considered illegal drugs.
- **Inhalant.** A substance containing a volatile chemical, as defined in Section 484.002 of the Texas Health and Safety Code.
- **Medical Review Officer.** A licensed physician designated by the selected vendor or independent testing laboratory conducting the substance abuse tests who conducts the final review of all test results prior to reporting to the College.
- **Nonprescription Medication.** A drug that is authorized in the US pursuant to federal or state law for general distribution and use without a prescription in the treatment of human diseases, ailments, or injuries.
- **Positive Test.** A drug test confirming that a covered individual is subject to the effects of alcohol, a prescription drug, or an illegal drug or drug metabolite.
- **Prescription Medication.** A drug prescribed by a duly licensed physician, dentist, or other medical practitioner licensed to issue prescriptions for use solely by the individual that the medication is prescribed to and can only be obtained in the US with a prescription. Proof of a valid prescription will be required for prescription medication purchased in Mexico or another country as noted above. Prescriptions must be from a medical practitioner licensed in the U.S.
- **Specimen.** A tissue or product of the human body such as urine, blood, saliva, hair, or breath which is chemically capable of revealing the presence of drugs in the human body.
- **TPAPN.** Texas Peer Assistance Program for Nurses is a program established to help RNs and LVNs with issues of substance abuse and rehabilitation which offers an alternative to reporting to the licensing board. This program does not cover students or other health care practitioners.

V. Prohibited Conduct

Being subject to the effects of alcohol or an illegal drug while in the course and scope of clinical education while on EPCCCD property or clinical affiliate agencies is prohibited. Prohibited conduct may also include conduct related to alcohol or illegal drug use that occurs outside of educational experiences if such impairment has the potential to adversely affect clinical education, the safety of others, or the EPCCCD's reputation in the community.

1. In the case of alcohol, any detectable level of alcohol in blood, saliva, or on the breath using a breath analyzer.
2. In the case of illegal drugs, having a concentration level at or above the cutoff levels set by the United States Department of Health and Human Services Mandatory Guidelines for Federal Workplace Drug Testing Programs (as amended, latest version) or other guidelines established by clinical affiliates.
3. In the case of prescription medication, unauthorized and/or abuse of prescription medication when taken in quantity not prescribed or for purposes other than those intended by the prescription, including taking prescription medication prescribed to another individual.

- a) Prescription medication purchased in another country without a valid prescription from a U.S. licensed physician, dentist, and/or recognized medical practitioner will be considered a violation of this policy. Proof of a valid prescription will be required for all prescription medication.
- b) A student taking prescription medication which may reasonably interfere with educational performance, judgment, attendance, behavior and/or safety, must provide medication documentation to the designated administrator demonstrating their ability to perform safely before being permitted to attend clinical education courses. A physical examination or medical clearance indicating no limitations in activity due to medication must be on file with the *Pre-testing for Substance Abuse Consent Form* in the event of a positive test due to prescription medication.
- c) A student may request reasonable accommodation if they are taking a prescription medication that interferes with their ability to perform the essential functions of their course requirements.

In the case of students, this must be documented on the student's physical examination and their statement of Physical/Technical Standards. Documentation must be reviewed and appropriate plans must be completed through the Center for Students with Disabilities.

- 4. Failure to report a new arrest or conviction related to violation of an alcohol and/or drug statute to the appropriate administrative supervisor is considered a violation of this College procedure FB-9 *Substance Abuse Testing for Health Occupations Students*.

VI. Identification of Programs whose Students are subject to Testing

- A. Programs will be identified by the appropriate educational administrator based upon (1) requirements from clinical affiliates, (2) accrediting agency requirements, and (3) licensing/certifying agency requirements.
- B. All students enrolled in identified programs will be required to undergo initial testing as described in Section III of this College procedure.
- C. Requirements for testing are subject to change based upon changes in affiliation agreements and other external requirements.

VII. Circumstances in which Students are subject to Testing

- A. Initial Substance Abuse Testing. Students accepted to and/or enrolled in health-related credit and non-credit programs with a clinical component requiring direct patient care are required to submit to initial substance abuse testing.
 - 1. Positive drug test results will result in the withdrawal of the application for admission to a specialized-admissions program and/or enrollment in other specified health-related courses/programs.
 - 2. The applicant will be informed in writing by the appropriate educational administrator that he/she did not meet required standards for enrollment.
 - 3. Students are disqualified from being considered for admission/enrollment in a health-related course/program at EPCCCD for a period of one-year as specified by clinical affiliates.
 - 4. For students, drug testing must be conducted prior to a student's first clinical rotation (no earlier than 3 months and no later than two weeks prior to the initial clinical course starting date). Students who withdraw from a clinical education program for more than one semester must repeat drug testing at their own expense prior to re-entry.
- B. Reasonable Suspicion Substance Abuse Testing. Reasonable suspicion substance abuse testing may be initiated when there is reasonable belief that a student is impaired or using or has used illegal drugs in violation of this College procedure. Reasonable suspicion must be based upon specific objective facts and reasonable inferences. This may be based upon (but not limited to) the following:
 - 1. Observable phenomena, such as direct observation of drug use and/or physical symptoms or manifestations of being subject to the effects of a drug or alcohol, including detection of alcohol on a covered student's breath.

2. Abnormal conduct or erratic behavior while in the course and scope of clinical education courses, unexplained and/or frequent absenteeism, unexplained and/or frequent tardiness, personality changes, disorientation, or deterioration in performance and/or interpersonal relationships.
3. Evidence that a covered student has tampered with a drug test.
4. Evidence that a covered student has caused or contributed to an accident while in the course and scope of educational experience which results in injury to a patient or other individual or damages to property over \$500.
5. Evidence that a covered student is involved in any irregularity in the documentation or handling of drugs, evidence of missing or unaccounted-for drugs, inappropriate disposal of, or evidence of tampering with, drugs when the covered student has access to such drugs.
6. Discovery or presence of illegal or suspicious substances or materials in the student's possession or near their assigned educational site.

Reasonable suspicion drug testing may be requested by either EPCCCD or an assigned clinical facility. Depending upon the situation and agency requesting the test, cost may be paid by EPCCCD, the clinical facility, or the student.

- C. *Random Drug Testing. Students are not subject to random drug testing at either EPCCCD or the assigned clinical facility at this time.*
- D. *Follow-Up Drug Testing. Follow-up drug testing for individuals undergoing approved drug/alcohol rehabilitation may be required during or following completion of the program.*

VIII. Specimen Collection and Testing

- A. Specimens will be collected by the approved vendor/testing laboratory with regard for the privacy of the student.
- B. Testing will be conducted by an independent, licensed laboratory, following the appropriate chain of custody and laboratory procedures.
- C. Testing will follow accepted medical and scientific procedures, as verified by the independent, licensed laboratory, including the establishment of controls.
- D. Specimens which are compromised and invalidated or which cannot be read due to dilution may result in re-testing.
 1. The student will be contacted to reapply and submit another specimen within a specified time frame. Additional fees will need to be paid to the vendor by the student for any re-testing.
 2. Failure to submit another specimen within the specified time frame will result in a "refusal to be tested" result. Appropriate action will result; to include disciplinary action, denial of enrollment, or denial of admission.
- E. Evidence that the specimen was deliberately tampered with, contaminated, or altered with the intent to invalidate the results will result in a "refusal to be tested" result. Appropriate disciplinary action will result.
- F. Substance abuse testing will be for the following substances:
 1. Amphetamines (e.g. methamphetamine, Ecstasy, speed, uppers, methylphenidate, eve, crystal)
 2. Barbiturates (e.g. Depressants, GHB, Downers, secobarbital, pentobarbital, butabarbital, phenobarbital)
 3. Benzodiazepines (e.g. Valium, Librium, tranquilizers, sleeping pills, anxiety pills)
 4. Cocaine metabolite (e.g. cocaine, coke, crack)
 5. Opiates (e.g. opium, morphine, codeine, fentanyl)
 6. Phencyclidine (e.g. PCP, Angel Dust)
 7. Marijuana (THC) metabolite (e.g. cannabinoids, marijuana, pot, smoke, weed, mary jane)

8. Methadone (e.g. dolophine, often used in treatment of heroin addiction)
9. Methaqualone (e.g. Quaaludes)
10. Propoxyphene (e.g. Darvon, Darvocet)

TESTING PROCESS:

Testing procedures may change depending upon outside vendor requirements.

- I. *Student will go on-line to the indicated website and enter the appropriate code. The code is provided by the vendor to the College, and the College will provide the code to the student.*
 - A. Student places order and submits payment (by credit card on-line or by money order to the vendor by mail). Once payment is confirmed by the vendor, a confirmation page will be printed by the student (immediately on-line or upon receipt of e-mail) .
 - B. The confirmation page must be taken (DO NOT MAIL) to the appropriate EPCCCD location based upon course/program of application/enrollment.
 1. A copy of the confirmation page will be retained by the EPCCCD representative.
 2. The student will be asked to submit a copy of the *Pre-testing for Substance Abuse Consent Form* to the EPCCCD representative. This form may be obtained in advance or obtained at this time. The student must agree to the release of the test results to EPCCCD in writing.
 3. A *Chain of Custody* form will be provided to the student after receipt of the *Pre-testing for Substance Abuse Consent Form*. This form must be taken to an approved testing site (list provided to student) within 5 working days of the date on the confirmation form.
 - (a) Failure to complete the testing within 5 working days will result in a notification of “no show” by the testing agency to EPCCCD and forfeiture of the paid fee.
 - (b) The student will be required to re-apply for the testing process, following each of the preceding steps and pay the required fees.
 - (c) A “no show” result will not count as a positive test.
 4. An e-mail will be sent by the vendor to the student relaying the test results.
 - (a) Results take approximately 24 business hours for negative tests and 72 business hours for a positive test.
 - (b) All positive tests are reviewed by the testing laboratory’s Medical Review Officer prior to releasing the results.
 5. The student prints a Certificate from the website using the code provided in the results e-mail.
 - (a) The student submits a copy of this Certificate to the appropriate educational administrator (same location where *Chain of Custody Form* is obtained) who confirms the results and provides an appropriate clearance/non-clearance letter to the student.
 - (b) The student must provide a copy of the clearance letter to the appropriate program coordinator in order to be assigned to a clinical rotation.
- II. Disciplinary Action
 - A. Students with a positive test result will have their results reviewed by the appropriate educational administrator.
 1. Students who are approved for enrollment with a positive test must

- a. Have a current physical examination or other correspondence from their healthcare provider licensed in the United States. The documentation must be dated within 3 months of the testing date.
 - b. Current Student Physical/Technical Standards form signed by the student indicating any declared limitations.
 2. Students who are approved for enrollment with a positive test result must have a written plan for their accommodation from the EPCCCD Center for Students with Disabilities if necessary due to declared limitations. Copies of necessary medical documentation for the accommodation plan must be on file with both the educational administrator and the Center for Students with Disabilities.
 3. Changes in student's physical/mental status must be documented by updated medical documentation. Re-testing may be required depending upon the medical documentation provided.
 4. Students who are not cleared for assignment to a clinical rotation will be administratively withdrawn from any enrolled health-related courses and will be barred from enrollment in health-related courses and programs at EPCCCD for a period of one-year. Notification of this disciplinary action will be sent in writing by the Vice President of Student and Enrollment Services.
- B. Students with a positive test result, which does not meet the criteria stated in this College procedure FB-9 *Substance Abuse Testing for Health Occupations Students* under "TESTING PROCESS," Section II. A. 1 for clearance, will be administratively withdrawn by the appropriate educational administrator from any health-related courses.
1. The educational administrator will communicate these results to the student in writing.
 2. The educational administrator will submit a request for further disciplinary action to the Vice President of Student and Enrollment Services. This request will be to bar the student from any future enrollment in either credit or non-credit health-related courses at EPCCCD for a period of one year. The Vice President of Student and Enrollment Services will notify the student in writing of this action and will have this disciplinary action posted on the student's academic record.
 3. Evidence of tampering with tests, injury to other individuals or property due to substance use, or arrest/conviction of any substance related crimes may result in additional disciplinary action (e.g., probation, suspension) as determined by the Vice President of Student and Enrollment Services.



El Paso Community College Student Information Sheet:

For College Procedure FB-9:
Substance Abuse Testing for
Health Occupations Students

Substance Abuse Testing

In order to ensure that health care facilities are in compliance with their accreditation guidelines, all students enrolled in specified health-related educational courses and programs are required to undergo substance abuse testing beginning in Fall 2007. Students who do not pass the drug screening will be unable to complete course/program requirements. **Therefore, students who fail to obtain clearance may be prohibited from admission or enrollment in specified courses/programs for a period of one year.**

In addition to the stated external requirements, it is noted that health care providers are entrusted with the health, safety, and welfare of patients, thus requiring the exercise of good judgment and ethical behavior. They also have access to confidential and sensitive information. Substance abuse testing is one of the methods for assessing the applicant's suitability to function in a clinical setting. Clinical learning experiences are an essential and required part of most health-related educational courses and programs. Students, who cannot participate in clinical rotations due to adverse activities revealed through substance abuse testing, cannot complete course/program requirements. Students not cleared for clinical learning experience will be administratively withdrawn from enrollment or admission in specified health-related educational courses and programs. **Therefore, students who fail to obtain clearance may be prohibited from admission or enrollment in specified courses/programs for a period of one year.**

How to complete the substance abuse test:

1. Go to the vendor's website at www.elpasoex.com and complete the on-line application for substance abuse testing.
2. Enter the appropriate EPCC code where indicated in the left column under "Order Code" so that test results are provided directly to EPCC. The code you enter is dependent upon the program you are applying for or enrolling in. Please make sure you supply the correct code to avoid delays in processing your final status:
 - a. Continuing Education Health Student.....A3S52
 - b. Credit Health Occupations Student (except Nursing).....B7P28
 - c. Credit Nursing Student.....A9S95
3. While on the web site, make sure you complete the authorization for the background check. This provides authorization for the company to run your drug test. They will NOT conduct any other background checks. Background checks approved for clinical clearance are completed by another process.
4. Complete payment for the test, either on-line, by credit card, or by money order.
 - If paying by credit card, note that the name and address on file with the credit card company must match exactly what you entered when you created the applicant account at the beginning of this process.
 - If not paying using a credit card, log out at this point. Payment can be made by money order. Send your money order to:

American DataBank Group
110 16th Street 8th Fl.
Denver, CO 80202

Make sure your money order states: "Payment for drug screen ordered online on <date>. Ref: EPCC". Make sure the name and address on the money order exactly match what you entered online.
5. If paying by credit card, print the payment confirmation page. If paying by money order, print the payment confirmation that will be emailed to you once payment is received.

6. A copy (keep the original for your files) of the confirmation page must be taken (DO NOT MAIL) to one of the following locations:
 - a. If applying or enrolling in the credit Nursing or Vocational Nursing program:
 - 1) Associate Degree Nursing Program (RN)

Pauline A. Ballesteros RNC, MSN, Nursing Program Coordinator
OR
Pat Montes, Nursing Lab Supervisor
Room H 221, Rio Grande Campus
100 West Rio Grande
El Paso, TX 79901
 - 2) Vocational Nursing Program (VN)

Laura Jimenez, RN, BSN, Vocational Nursing Program Coordinator
OR
Valerie Chavez, Nursing Lab Assistant
Room D 109, Mission Del Paso Campus
10700 Gateway East
El Paso, TX 79927
 - b. If applying for, or enrolling in, any of the allied health credit programs:

Ms. Souraya Hajjar (Or one of her staff members)
Dean, Health Occupations, Math & Science
Campus Dean, Rio Grande Campus
Room A240, Rio Grande Campus
100 West Rio Grande
El Paso, Texas
 - c. If applying, or enrolling in, a non-credit nursing program or in allied health programs:

Ms. Cheryl Stiles (Or one of her staff members)
Director, Continuing Education, Health
Rio Grande Campus, Room A240
100 W Rio Grande
El Paso, Texas
7. Complete and submit the Pre-testing Consent Form. You cannot obtain the *Chain Of Custody Form* without submitting this form.
8. Obtain the *Chain of Custody Form*, and refer to the list of approved sites.
9. Complete the test within 5 working days of obtaining the confirmation form from www.elpasoex.com. Failure to complete in a timely manner will result in a “no show” result, and you will be required to complete the entire process again and pay the fee again.
10. Within 24-72 working hours, you should receive an e-mail from the vendor with a code.
11. Go on-line to www.elpasoex.com, enter the assigned code, and print out the Certificate.
12. Turn in a copy of the Certificate to the educational administrator listed above who will verify the results and provide you with a clearance or non-clearance letter.
13. Submit a copy of your clearance letter to your program coordinator to schedule your clinical assignments.

Please review the complete College procedure on substance abuse testing (College Procedure FB-9 *Substance Abuse Testing for Health Occupations Students*) for detailed information on the process, impact of a positive test or refusal to test, and potential disciplinary action.



Form for College Procedure FB-9: *Substance Abuse Testing for Health Occupations Students*

El Paso Community College Pre-testing for Substance Abuse Consent Form for Students

Substance abuse testing is required for student enrollment in selected health-related courses/programs. This requirement is mandated by external agencies (e.g. clinical affiliates, regulatory agencies). Failure to submit to substance abuse testing will result in denial of admission or enrollment.

Instructions: This form must be completed and submitted to the designated College representative along with the confirmation form from the testing agency (provided to you upon completion of your application and payment of required fees to the vendor). Failure to complete this form will result in non-receipt of the *Chain of Custody Form* required to complete the testing process.

General Information:

PROGRAM: _____

Name: _____

Address: Street _____ City _____ State _____ Zip _____

Phone: (Home) _____ (Work) _____ (Cell) _____

Consent. I understand that I am providing consent for release of substance abuse test results as follows:

1. Consent is given to the testing laboratory/vendor to provide substance abuse test results to El Paso Community College.
2. Consent is given to El Paso Community College to provide general information about substance abuse test results to clinical affiliates who require information that such tests have been completed and that I am cleared for enrollment and attendance in a clinical health-related program.
3. I understand that access to this information by employees of EL PASO COMMUNITY COLLEGE is restricted to those persons having a demonstrated absolute need to know and that information is maintained in a separate secure file.

Further, my signature indicates my consent for release and storage of information as indicated above.

Date: _____ Signature: _____