POLICY
One purpose of Ageia’s Drug Free Workplace Program is to encourage employees to seek assistance if they are struggling with alcohol or drug problems. Our focus is creating a work environment that is safe, healthful, and productive. Addiction greatly impairs an employee’s job performance and safety perception. Ageia Health Services will support a process of drug and alcohol testing as a step in detecting employees who may either need intervention or who do not support the same work ethics. To ensure the accuracy and fairness of our testing program, all testing will be conducted according to Substance Abuse and Mental Health Services Administration (SAMHSA) guidelines where applicable. All drug-testing information will be maintained in separate confidential records.

DEFINITIONS
1) SAMHSA- Substance Abuse and Mental Health Services Administration is a federal program that is part of the Department of Health and Human Services. They offer programs and services for drug free work programs. SAMHSA Workplace Programs Home Page
2) MRO- Medical Review Officer is a licensed physician who is responsible for receiving and reviewing laboratory results generated by an employer's drug testing program and evaluating medical explanations for certain drug test results, i.e., prescribed medications.

PROCEDURES
1) All drug-testing information will be maintained in separate confidential records, with access limited to approved, testing staff and executive supervisors as needed for disciplinary review process. A 3-ring binder shall be used to store the current year’s log, testing release forms, and the test report (results). At the beginning of the year these records will be purged and retained according to the records retention guidelines. These records are never to be filed in the employee’s personnel record.
2) Any disciplinary action relating to positive test results for Reasonable Suspicion testing or Post-Accident testing will be reviewed with VP of Operations and/or Company President, prior to the action taking place. All documentation and reports relating to the situation will be made available to the supervisor for review. Disciplinary action, including termination will follow company policy.
3) The drug and alcohol testing programs will be followed as outlined below:

Pre-Employment Testing:
a. Ageia Health Services will require all applicants it intends to hire to be tested for the use of controlled substances as a pre-qualification condition. Applicants, who refuse to submit to such testing, will be disqualified from further employment consideration. If the applicant disputes a
positive test result they will be referred to the contracted clinic for a screening test and confirmation test by a MRO. Applicants that offer concern regarding their prescribed medication(s) affecting a test result will be referred to the contracted clinic for a screening test and confirmation test. A MRO may inquire to determine if the employee has a legitimate medical explanation, such as a physician’s prescription, for a positive drug test. The applicant will initially be responsible for the cost of this test, but will be reimbursed if the outcome results are negative for illegal drugs. Second step testing must be done that same day to be considered valid. A negative second step test result is not a guarantee of employment. All other unsubstantiated positive test results will be disqualified from further employment consideration. Before sending the applicant for testing, complete the Clinic Authorization and Consent form. Keep the original in the drug testing notebook and send a copy with the candidate.

b. Upon completion of the criminal background and reference checks, an approved testing staff member will conduct the pre-employment drug screen. The approved testing staff will follow all testing steps as explained in the Step by Step Testing Guideline for pre-employment testing.

c. The Drug Testing Release Form and Reporting Log will be completed after results are identified.

d. If any portion of the test is compromised the candidate will be asked to be re-tested while they are still on site.

Reasonable Suspicion Testing:

a. Ageia Health Services will require current employees to submit to testing for controlled substances based on specific, contemporaneous, definable observations concerning the appearance, behavior, speech, or body odors of the employee by at least one supervisor trained in detecting the signs and symptoms of prohibited drug use. All employees are held responsible for reporting unprofessional behaviors and unsafe work practices to the immediate attention of a supervisor. The supervisor that has knowledge of the suspicious actions will be responsible for accurately documenting the specific behavior and immediately reporting the incident to the designated testing staff member.

b. Employees who are requested to undergo reasonable suspicion testing will be required to submit to the illegal substance test. Any attempt to invalidate, tamper with the test, or refuse the test will subject the employee to disciplinary action, up to and including termination.

c. The approved testing staff member will follow all testing steps as explained in the Step by Step Testing Guideline for reasonable suspicion testing. Testing will be conducted by a contracted clinic and the company will be responsible for the cost of testing. Employees who are requested to undergo reasonable suspicion testing will be transported to the testing site and home by the designated testing staff member. Prior to transporting the employee, complete the Clinic Authorization and Consent form. Keep the original in the drug testing notebook and take a copy with you to the clinic. An employee who is required to take a reasonable suspicion drug
test will be considered by Ageia Health Services as unqualified to work and relieved from duty pending the results of their test and a thorough investigation. Positive test results will be cause for disciplinary action up to and including termination.
d. As required by state/federal wage and labor laws (FSLA), employees who agree to the testing will be compensated for the time it takes to travel to the site and complete the testing. If the employee is injured while under the influence of illegal drugs or alcohol, the injury will be evaluated in accordance to the State Worker’s Compensation Law(s).
e. The Drug Testing Release Form and Reporting Log will be completed after results are identified.

Post-Accident Testing
a. Any employee who is involved in a job-related accident may be subject to a drug test to determine if substance abuse was a factor causing the accident. Upon completion of the workplace injury report, the supervisor will conclude whether the employee’s actions or inactions were possibly a factor causing the accident. If the employee’s actions or inactions are a factor, post-accident drug testing will be done. The reporting supervisor should immediately notify the incident to the designated testing staff member. Ageia’s primary concern will always be the health and welfare of the employee, therefore, testing may be conducted after the injured employee has been medically treated and released for modified or full duty.
b. Employees who are requested to undergo post-accident testing will be required to submit to the illegal substance test. Any attempt to invalidate, tamper with the test, or refuse the test will subject the employee to disciplinary action, up to and including termination.
c. The approved testing staff member will follow all testing steps as explained in the Step by Step Testing Guideline for post-accident testing. Testing will be conducted by a contracted clinic and the company will be responsible for the cost of testing. Employees who are requested to undergo post accident testing will be transported to the testing site and home by the designated testing staff member. Prior to transporting the employee, complete the Clinic Authorization and Consent form. Keep the original in the drug testing notebook and take a copy with you to the clinic. If the injured employee is released for modified duty and the test results are positive for an illegal substance, the employee will be considered by Ageia Health Services as unqualified to work and relieved from duty pending a thorough investigation. The injury will be evaluated in accordance to the State Worker’s Compensation law(s). Positive test results will be cause for disciplinary action up to and including termination.
d. As required by state/federal wage and labor laws (FSLA), employees who agree to the testing will be compensated for the time it takes to travel to the site and complete the testing.
e. The Drug Testing Release Form and Reporting Log will be completed after results are identified.
Alcohol Testing Procedures:

a. Ageia Health Services will require current employees to submit to testing for alcohol use based on specific, contemporaneous, definable observations concerning the appearance, behavior, speech, or body odors of the employee by at least one supervisor trained in detecting the signs and symptoms of prohibited use. All employees are held responsible for reporting unprofessional behaviors and unsafe work practices to the immediate attention of a supervisor. The supervisor that has knowledge of the suspicious actions will be responsible for accurately documenting the specific behavior and immediately reporting the incident to the designated testing staff member.

b. Employees who are requested to undergo reasonable suspicion testing will be required to submit to the illegal substance test. Any attempt to invalidate, tamper with the test, or refuse the test will subject the employee to disciplinary action, up to and including termination.

c. The approved testing staff member will follow all testing steps as explained in the Step by Step Testing Guidelines for reasonable suspicion testing. Testing will be conducted by a contracted clinic and the company will be responsible for the cost of testing. The employee will be tested with an alcohol detecting breath analyzer. Employees who are requested to undergo reasonable suspicion testing will be transported to the testing site and home by the designated testing staff member. An employee who is required to take a reasonable suspicion alcohol test will be considered by Ageia Health Services as unqualified to work and relieved from duty pending the results of their test and a thorough investigation. Positive test results will be cause for disciplinary action up to and including termination.

d. As required by state/federal wage and labor laws (FSLA), employees who agree to the testing will be compensated for the time it takes to travel to the site and complete the testing. If the employee is injured while under the influence of alcohol, the injury will be evaluated in accordance with the State Worker’s Compensation Law(s).

Return to Duty Testing:
An employee who has voluntarily reported a drug or alcohol abuse problem, and who is eligible for a medical leave to seek rehabilitation treatment will be subject to, unannounced follow-up testing for at least 6 months but no more than 12 months. A positive test result will result in disciplinary action up to and including termination.

Drug Testing Procedures:

a. Drug Testing will be performed only by knowledgeable, certified, administrative staff members or contracted testing clinics. These individuals will be responsible for maintaining the integrity of the collection process, ensuring the privacy of employees and new hire candidates being tested, ensuring the security of the specimen, and avoiding conduct or statements that could be viewed as offensive or inappropriate.
b. Our company testing candidates must complete qualification training and hold a current certificate, *Specimen Collector Certification*. Training is available to Executive Directors, Directors, Assistant Executive Directors, Business Office Manager, Human Resource Manager, Director of Health Services, VP of Operations, and RN Consultant. Training, testing, and certification are available on the Ageia website under Drug Free Workplace, *Specimen Collector Certification*. The responsibilities of this position are extensive, therefore, the company encourages that all testers complete the *Supervisor Drug Free Workplace Training* and competency test.

c. In-house drug testing will be conducted for pre-employment only. Reasonable suspicion, In-house drug testing will be conducted post-accident, and alcohol testing will be performed at our contracted clinics. Both in-house and clinic drug testing will be performed utilizing a urine sample. Samples will be tested for marijuana, cocaine, opiates, amphetamines and methamphetamines. During pre-employment testing, a candidate may request, at their own initial expense, a second test to be done. It will need to be conducted at the clinic and on the same day as the initial test. Our contracted clinics typically perform a split test; therefore, there will be no reason for second testing to be done in the case of reasonable suspicion and post-accident testing. A picture I.D. is required to be shown at the time of collection.

Ageia Health Services reserves the right to test for the above drugs or amend the list of drugs with proper notice to employees or applicants.

**RELATED POLICIES/REFERENCES**
1) Specimen Collector Certification
2) Supervisor Drug Free Workplace Training
3) Employee Drug Free Workplace Education

**FORMS**
1) Pre-**Employment** Drug Screen Authorization
2) **Clinic Authorization and Consent**
3) **Drug Testing Log**
4) **Step by Step Testing Guidelines**
5) **Substance Testing Clinic List**

**RETENTION GUIDELINES**
1) All employee drug related documents- five (5) years from the making of the record
2) Verified positive test results used to deny employment- one (1) year from the date of filling the position (same as the job application)