I. SCOPE / PURPOSE

This policy outlines the goals and objectives of Novant Health Criminal Record Check (CRC) and Drug Screen (DS) for students and faculty.

II. POLICY

A. Novant Health (NH) has a vital interest in maintaining a safe, healthy and efficient working and patient care environment. Being under the influence of drugs or alcohol poses a serious safety and health risk to the patient, user and all those who work with a user. The use, sale, transfer, possession of alcohol or drugs (illegal or illegally obtained) poses an unacceptable risk in maintaining a safe and healthy work and/or patient environment.

B. Novant Health expresses its intent through this policy to comply with federal and state rules, regulations or laws that relate to the maintenance of a workplace free from illegal drugs and alcohol.

C. Use, consumption or possession of alcohol, or illegal or illegally obtained drugs by a student or faculty while on Novant Health property is strictly prohibited and cause for dismissal from the property.

D. As a condition of participation for clinical assignment at Novant Health, all students and faculty are required to abide by the terms of this policy. The school must notify the Director of Student Programs (or designee) of any criminal statute charge or conviction.

E. Students and faculty will be held to the same standards for criminal record checks and drug screens as Novant Health employees.

III. QUALIFIED PERSONNEL

Vice President of Learning and Development, Director of Student Programs, Coordinator of Student Programs (or designee); Sr. Director of Human Resources

IV. EQUIPMENT

Not Applicable
V. PROCEDURE

The procedure serves as a guideline to assist personnel in accomplishing the goals of the policy. While following these procedural guidelines personnel are expected to exercise judgment within their scope of practice and/or job responsibilities.

Prior to the student or faculty’s first clinical rotation or internship:
A. School designee will be required to submit the following information on all students and faculty to the Novant Health Director of Student Programs or designee.
   i. Results of a minimum 10-panel urine drug screen. The 10-panel must include: AMP (amphetamine), BAR (barbiturates), BZO (benzodiazepines), COC (cocaine), THC (marijuana), mAMP (methamphetamine), OPI (opiate), PCP (phencyclidine), OXY (oxycodone) and Methadone.
   ii. Verification that criminal records check has been completed. Criminal records check (CRC) includes a nationwide check in each state for the past 7 years. The check will be based on the student or faculty social security number and address history. The check also must include a sex offender registry check and OIG check. Additional record checks may be required as applicable for a clinical rotation in accordance with state and federal law.
   iii. Summaries or school interpretation of positive CRC or DS will not be acceptable. A student’s positive results are to be shared with the NH Director of Student Programs or designee to determine if access to NH will be granted.

The above results will remain in effect for the student as long as they are progressing in their course of study, and for faculty as long as they are continuously employed.

Drug and Alcohol testing of Students and Faculty
B. Novant Health may request alcohol or drug testing of any student or faculty who is:
   i. Exhibiting symptoms consistent with being impaired (i.e. slurred speech, inappropriate reactions, irrational behavior or the smell of alcohol on the breath).
   ii. Involved in an accident that did or could result in harm to a student, employee or patient.
   iii. Observed alcohol or drug use while on duty.
   iv. Near or involved in actual incidents/accidents (i.e. narcotic count discrepancies/tampering, accidents involving careless acts with apparent safety violations, documentation and patient report discrepancies, etc.)
   v. Unusual pattern of medication administration as reported by an automated medication administration system.
   vi. Any other causality as outlined under Drug and Alcohol testing of Employees in Novant Health Fitness for Duty/Substance Abuse Policy HR-3060.

House Supervisor or designee and Director of Student Programs or designee will be immediately notified by faculty or unit manager of any student or faculty suspected of impairment.

Drug and alcohol testing will be done at the expense of the student or faculty except when a general suspicion testing is done of a group and the
student/faculty was part of that group, (i.e. all day or night shift) at which time Novant Health may elect to incur the cost of testing.

Students will be escorted to the nearest hospital ED facility or nearest drug testing facility of the school’s choice by a faculty member or designee. If there is not a known faculty member on site, an attempt will be made to contact the school.

If a faculty member is involved, nursing administration/Director of Student Programs (or designee) will attempt to notify the Dean of the program for school representation. Faculty or students will be escorted to Emergency Department after hours, by the hospital supervisor or designee and program Dean or designee if available.

All students and faculty are informed of their rights and responsibilities prior to testing and will receive a written confirmation of the test results if confirmed positive. The student and faculty will review their rights and responsibilities before testing.

Students and faculty have the right to have their drug and alcohol testing done at the facility of their choice so long as the testing is done under the schools guidelines and the North Carolina Controlled Substance Examination Regulation N.C.G.S. 95-230 et seq. The drug screen will contain a minimum 10-panel drug screen and alcohol samples. This must be completed within 120 minutes of the notification received by the manager of the unit or hospital supervisor.

Any student/faculty tested in a “reasonable belief/suspicious behavior” situation will be suspended from participation in a clinical assignment pending receipt of written test results. Any student or faculty whose drug or alcohol test is reported positive will communicate with the Medical Review Officer (MRO). The purpose of this conversation is to determine if a positive finding could come from a source other than drugs or alcohol. The MRO will then communicate their findings with the appropriate NH representative (Director of Student Programs or designee) to determine if further review is indicated based on the input from the MRO.

Refusal to consent to drug/alcohol testing as a condition of participation at NH for a clinical site or for causality will prohibit or revoke the student/faculty’s clinical assignment.

Any student/faculty that is drug/alcohol tested for causality will be asked not to drive a vehicle off the hospital campus. For the safety of the student/faculty and the public, any student/faculty that refuse to arrange for alternate transportation, will be reported to the NH Public Safety Department. If the student/faculty is clearly impaired and insists on driving, NH Public Safety will inform the student/faculty that law enforcement will be notified.

**Criminal Records Check**

C. Students and faculty must notify the school/college/university of the following:
charges, convictions, pleas of no contest, or prayers for judgment of a criminal offense. Upon receiving notification from student or faculty member, the school/college/university will notify NH Director of Student Programs (or designee) in writing prior to the student or faculty member’s next day of clinical. Failure of a student/faculty to report a charge, conviction, plea of no contest or prayer for judgment will be grounds for immediate termination of participation in his or her clinical placement.

i. Upon the notification to NH Director of Student Programs (or designee) of an event on a criminal record check, pending charges and or a new conviction the Director of Student Programs (or designee) with the assistance of Human Resources as needed, will evaluate and determine if the individual will be allowed clinical placement.

ii. Novant Health has the right to exclude any student or faculty from the facility for any reason, unless otherwise specified in the Clinical Education Agreement.

**Former Employees**

D. Students and faculty who are former employees of Novant Health and not eligible for rehire, will not be granted clinical access to any Novant Health facility. However, if sufficient time has passed, the past employee may submit a request to Employee Relations and have their employee files reviewed to determine if this status will prevent them from being approved for a clinical assignment.

**VI. DOCUMENTATION**

School/College/University will submit evidence of a negative drug screen and verification of a Criminal Record Check to Novant Health Director of Student Programs (or designee). The Director of Student Programs (or designee) will maintain records in accordance with Novant Health’s Records Management Policy and Retention Schedules.

**VII. DEFINITIONS**

**Alcohol** means any beverage that contains ethyl alcohol (ethanol), but not limited to beer, wine and distilled spirits.

**Drug testing** means the scientific analysis of urine, blood, breath, saliva, hair, tissue and other specimens of the human body for the purpose of detecting a drug or alcohol.

**Illegal/Illegally obtained drug** means any drug that is not legally obtainable; any drug that is legally obtainable, but has not been legally obtained; any prescribed drug not legally obtained; any prescription drug not being used for the prescribed purpose; any over the counter drug being used at a dosage level other than recommended by the manufacturer or being used for a purpose other than intended by the manufacturer; and any drug not being used in accordance with bona fide medical therapy. Illegal drugs include, but are not limited to, marijuana, hashish, cocaine, crack cocaine, heroin, methamphetamine, phencyclidine (PCP), and so-called designer drugs and look-alike drugs.

**Legal drugs** are those drugs that are prescribed by the user’s treating physician and are
taken for the specific condition for which the drugs were prescribed.

**Under the influence** means a condition in which a person is affected by a drug or by alcohol in any detectable manner. The symptoms of influence are not confined to those consistent with misbehavior, nor to obvious impairment of physical and mental ability, such as slurred speech or difficulty in maintaining balance. A determination of being “under the influence” can be established by a professional opinion, a scientifically valid test such as urinalysis or blood analysis and, in some cases, by the opinion of a lay person.

**Clinical rotation or internship** is an experience performing direct patient care as appropriate while under the faculty supervision (direct or indirect). Also refers to indirect patient care; when patient records or business information are assessable and availed by the student.

**Post-Secondary student** is a student of a community college, university or other accredited post-secondary institution participating in an undergraduate or graduate course of studies.

VIII. RELATED DOCUMENTS

Clinical Education Agreement (ADM 200.13), NH Fitness for Duty/Substance Abuse (NH-LD-3060), NH Reportable Situations (NH-LD-LG-112) Non-employed workers Policy (NH-HR-3110), NH High School Students, Educational Experiences (NH-HR-8000), Post-Secondary Students, Educational Experiences (NH-HR-8001), Nursing Students in Presbyterian Healthcare facilities, Addendum A: Recognizing the Signs and Symptoms of Substance Abuse.

IX. REFERENCES

None

X. SUBMITTED BY

Director of Student Programs

XI. KEY WORDS

Drug Testing, Clinical Education Agreement, Criminal Record Check, Criminal Background Check, Illegal Drugs, Alcohol Testing, Students, Drug screens

XII. INITIAL EFFECTIVE DATE

January 1, 2011

DATES REVISIONS EFFECTIVE

Jan 2012, Feb 2013, Nov 2015, 05/2018, 07/2018

DATES REVIEWED (No changes)

Add HAMC 11/25/13

Date Due for Next Review

July 2021
SIGNATURE SHEET

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COMMITTEES APPROVED BY:

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